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ON-SCENE COORDINATOR'S REPORT
JARD COMPANY SITE
BENNINGTON, VERMONT

DECEMBER 23, 1991 - NOVEMBER 11, 1992

U.S. Environmental Protection Agency
Region I
Emergency Planning and Response Branch
60 Westview Street
Lexington, MA 02173
(617) 860-4300

OSC Signature

12/29/94
Date

PREPARED BY:

Dean Tagliaferro, On-Scene Coordinator
U.S. Environmental Protection Agency

David Strzempko
Roy F. Weston, Inc.
Technical Assistance Team

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1.0 EXECUTIVE SUMMARY

The following On-Scene Coordinator's (OSC) Report on the Jard Company Site (the "Site"), Bennington, Vermont, is a chronological summary of the United States Environmental Protection Agency (EPA), Region I, Emergency Planning and Response Branch (EPRB) response action. The report details the situation as it developed, the actions taken, the resources committed, the effectiveness of the removal action, the problems encountered and the OSC's recommendations.

This OSC Report was prepared according to the Code of Federal Regulations (CFR), Title 40, Protection of the Environment, Part 300, Subpart B - Responsibility and Organization for Response, Section 300.165, OSC Reports.

The EPRB initiated a Removal Preliminary Assessment/Site Evaluation (PA/SI) pursuant to 40 CFR 300.410 on March 19, 1991 to determine if conditions at the Site warranted a CERCLA removal action. The investigation indicated that approximately sixty 55-gallon drums were stored outside of the Site building. Two samples randomly collected from the drums yielded results of 820 parts per million (ppm) toluene and 90 percent unknown hydrocarbons. Surface soil samples indicated high concentrations of zinc, di-octyl phthalate (DOP), and polychlorinated biphenyls (PCBs), as well as low levels of volatile organic compounds (VOCs). Due to the imminent and substantial threat to human health and the environment, it was recommended by the EPRB Site Investigator (SI) that a time-critical removal action be performed.

On August 15, 1991, EPA Region I Deputy Regional Administrator Paul Keough signed an Action Memorandum authorizing $1,500,000 to mitigate the threat to public health or to the environment posed by the high levels of hazardous substances present in the drums and surface soils found at the Site.

On August 20, 1991, the court-appointed trustee for Jard Company ("Jard"), which had declared bankruptcy, indicated a willingness to perform the required removal activities. On October 10, EPA sent the trustee a draft scope of work detailing the required removal activities.

On October 28, 1991, a draft unilateral order was issued to the trustee. On November 12, 1991, the trustee resigned, and the OSC determined that a Fund-lead removal would be performed. Due to the resignation of the trustee, the EPA case attorney determined that a court ordered access agreement, in the form of a warrant, needed to be obtained.

The EPA case attorney worked toward securing the warrant for site access. However, an emergency situation occurred within the Site

building on December 23, 1991, when water pipes ruptured due to freezing and thawing conditions.

With the building's sprinkler system now inoperable, the threat of a release of materials in containers within the Site building from an uncontrolled fire posed a serious risk. The OSC determined response actions could not be delayed further and on December 24, 1991 posted 24-hour/day site security. Security was maintained to deter vandalism and provide an early warning system in the event of a fire. Additionally, telephone, electric and gas utilities were restored within the building, and EPA's prime Emergency Response Cleanup Services (ERCS) contractor, OHM Remediation Services, Inc. (OHM), of Findlay, Ohio, mobilized one person to the Site to prepare for a Fund-lead removal action.

On January 6, 1992, the OSC, a Roy F. Weston, Inc. Technical Assistance Team (TAT) member, and 5 additional OHM crew members mobilized to the Site. During the next month, drums and containers with greater than 5-gallon capacity were staged according to label information, and sampled. Bulking of materials within partially full drums was performed based on similar chemical properties. Also, approximately 583 small containers (of 5-gallons capacity or less) were staged. Four hundred sixty-one of the small containers had labels and were staged for labpack disposal, 43 of the containers were bulked based on similar chemical properties and sampled, while the remaining 79 containers were crushed, solidified, placed into drums and subsequently sampled.

Process water from a paint spray booth was pumped into new 55-gallon drums and sampled, and five bulk process tanks were sampled. Sand filter process tanks containing oil were drained and sampled, and outside of the building an approximate 16,000-gallon underground storage tank was uncovered and sampled, as were two drywells and an aboveground storage tank.

Oils were drained into drums from an impregnator oven and drying machine. A conveyor belt system associated with the impregnator oven, and the drying machine and the floors beneath it were sprayed with a sodium hydroxide based cleaner, and later pressure washed to reduce gross PCB concentration. Water generated from the cleaning process was drummed and sampled.

Approximately 80 soil samples were collected for on-site PCB screening analysis to delineate contaminated soils around exterior portions of the building.

Prior to disposal, a total of 269 55-gallon drums were staged within the building.

Several original factory sealed drums of product were transported off site by their original chemical manufacturers. This was

arranged by the OSC, who contacted the companies in an attempt to reduce overall removal action costs.

In March of 1992, rejected capacitors were transported off site and landfilled. Also, 35 drums containing 461 small laboratory containers were transported off site for disposal.

From June to November of 1992, all remaining wastes in bulk containers were disposed of in accordance with EPA guidelines. This included drummed wastes, tank wastes, and filters heavily contaminated with zinc. In addition, a total of 197.41 tons of PCB contaminated soil and debris was removed from the Site. The soil removal consisted of excavating and transporting off site the top two feet of soils with PCBs greater than 25 ppm for the purpose of reducing the direct contact threat.

On-site removal action activities were completed on November 11, 1992 at an estimated cost of $701,771.

2.0 SUMMARY OF EVENTS

2.1 Participating Agencies and Personnel

U.S. Environmental Protection Agency

Emergency Planning and Response Branch

Site Evaluation and Response Section I

On-Scene Coordinator	Dean Tagliaferro
On-Scene Coordinator	Carol Tucker
Site Investigator	Mary Ellen Stanton
Enforcement Coordinator	Pam Bruno

Chemistry Section

Chemist	Scott Clifford

Office of Regional Counsel

Case Attorney	Mark Lowe

Vermont Air and Natural Resources

Department of Environmental Conservation

Hazardous Waste Division	Stanley Corneille
	Mark Roi

Roy F. Weston, Inc.

Technical Assistance Team

On-Site Project Monitor	David Strzempko

Lockheed, Inc.

Environmental Services Assistance Team

Chemist	John Mirisola

Town of Bennington

Fire Chief	Troy Joseph
Assistant Fire Chief	A.J. Slocum
Hazardous Waste Coordinator	Mick Goldsmith

Emergency Response Cleanup Services Contractor

OHM Remediation Services, Inc.

Response Manager	Michael Blodgett
<u>Subcontractors:</u>	<u>Service</u>
A. Shapiro	Zinc Recycling
Air Products, Inc.	Breathing Air
Albany Cash Registers	Copier and Fax
Alpha Analytical, Inc.	Sample Analyses
AnalytiKEM	Sample Analyses
Business World	Office Furniture
Con-Test, Inc.	Sample Analyses
Empire Forklift, Inc.	Forklift

Environmental Action	Non-hazardous Waste Dumpster Service
Federal Express	Parcel Delivery
Ideal Fence and Fuels	Fence Installation
Laidlaw Environmental Services	Labpack Disposal Broker
Modern Landfill	Disposal Facility
Monmouth Electric	Electrician
New England Barrel	55-gallon Steel Drums
New England Equipment, Inc.	Backhoe Rental
Roy Plumbing & Heating	Plumbers
Stone Portable Toilet Rentals	Portable Toilets
Synergy Gas	LP Gas
Wackenhut, Inc.	Security Services
Waste Management, Inc.	Office Trailer
Waste Technology Services, Inc.	Disposal Broker
Environmental Technologies, Inc.	
Response Manager	Charlie Keegan
	Ray Willis
<u>Subcontractors:</u>	<u>Service</u>
Aerotek	Chemist
AnalytiKEM	Sample Analyses
Cardinal Compliance	Overpack Drums/Empty Drum Disposal
CWM Chemical Services, Inc.	Transportation and Disposal Facility
Container Management Corp.	Overpacks
Cycle Chem	Temporary Drum Storage Facility

Environmental Action	Non-hazardous Waste Dumpster Service
Federal Express	Parcel Delivery
Freehold Cartage	Transportation Services
NET Atlantic	Sample Analyses
Northeast Environmental Services, Inc.	Disposal Broker
OSCO Treatment Systems, Inc.	Disposal Facility
River Cement	Disposal Facility
Rollins Environmental Services (TX), Inc.	Disposal Facility
Stone Portable Toilet Rentals	Portable Toilets
Vermont Copier	Copier and Fax
Wackenhut, Inc.	Security Services
Waste Management, Inc.	Office Trailer

2.2 Site Location and Description

The Jard Company Site (the "Site") is situated on the north side of Bennington, Vermont (see Figure 1 - Site Location Map) on Bowen Road. The Site property is identified on two tax maps: Lot #73 on tax map 44 and Lot #77 on tax map 45. Jard also had owned an adjacent 22.9-acre lot (Lot #73 on tax map 45). For the purposes of this removal action, only Lot #73 on tax map 44 and Lot #77 on tax map 45, which contains the Site building, will be considered as the Site (see Figure 2 - Site Diagram).

The Site is bound on the north by Bowen Road (across which the UST Corporation is located); on the northeast by the state of Vermont Agency of Transportation Garage; on the east by the aforementioned undeveloped 22.9-acre parcel; on the south by the Roaring Branch of the Walloomsac River (across which the Mt. Anthony High School is located); and on the west by Little League baseball fields and an undeveloped lot. The area around the Site is recreational, industrial and residential.

The Site area encompasses approximately 11.26 acres with a 66,705 square foot building located on northern portions of the property. There are paved areas adjacent to eastern and western portions of the building that were used for parking, and a paved road extends around the rear (southern portions) of the building. The building

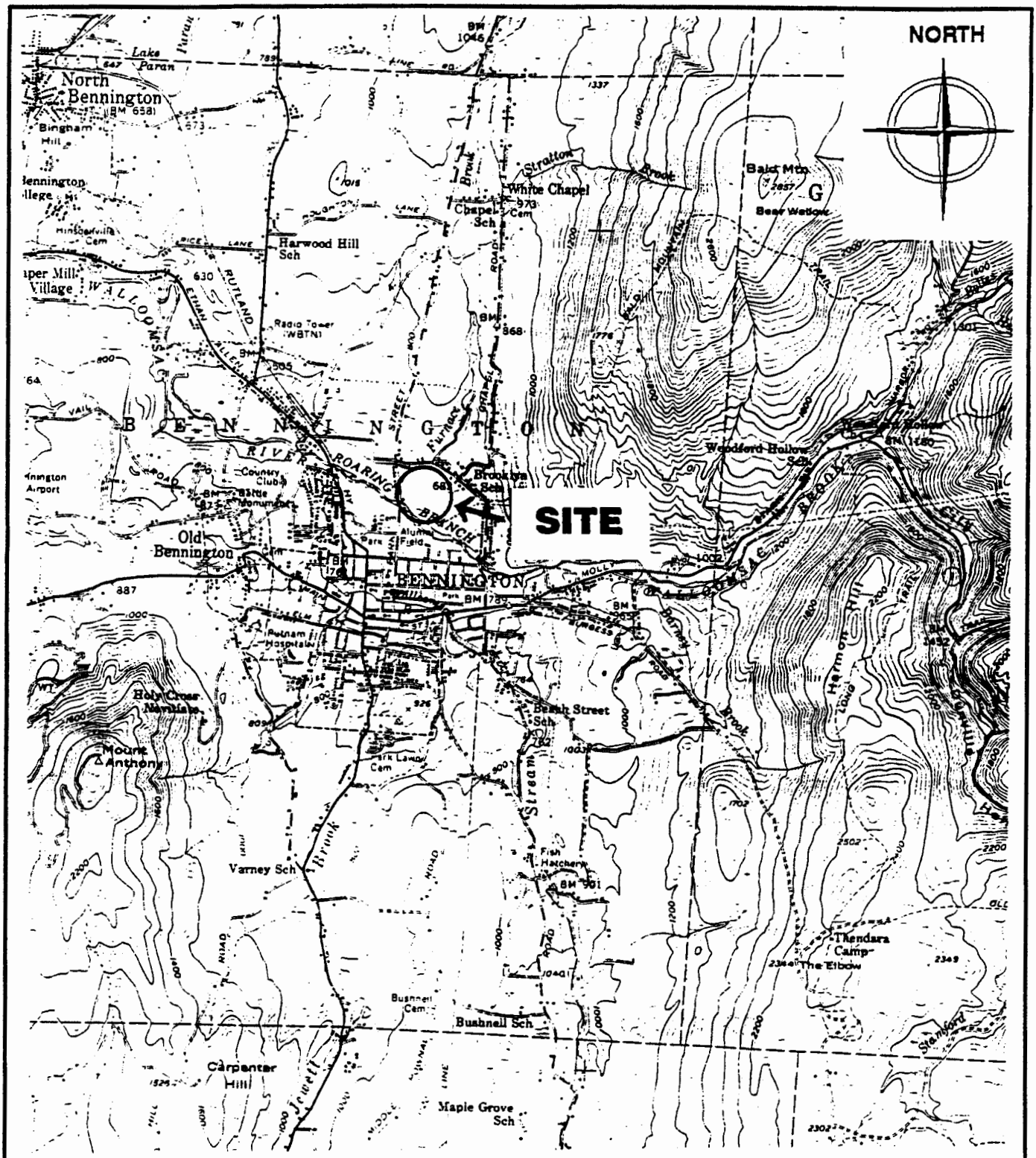

FIGURE 1
SITE LOCATION MAP
JARD COMPANY SITE
BENNINGTON, VERMONT

MAP DEVELOPED FROM THE USGS 1954 QUADRANGLE FOR BENNINGTON, VERMONT. 15 MINUTE SERIES - SCALE 1:62500.

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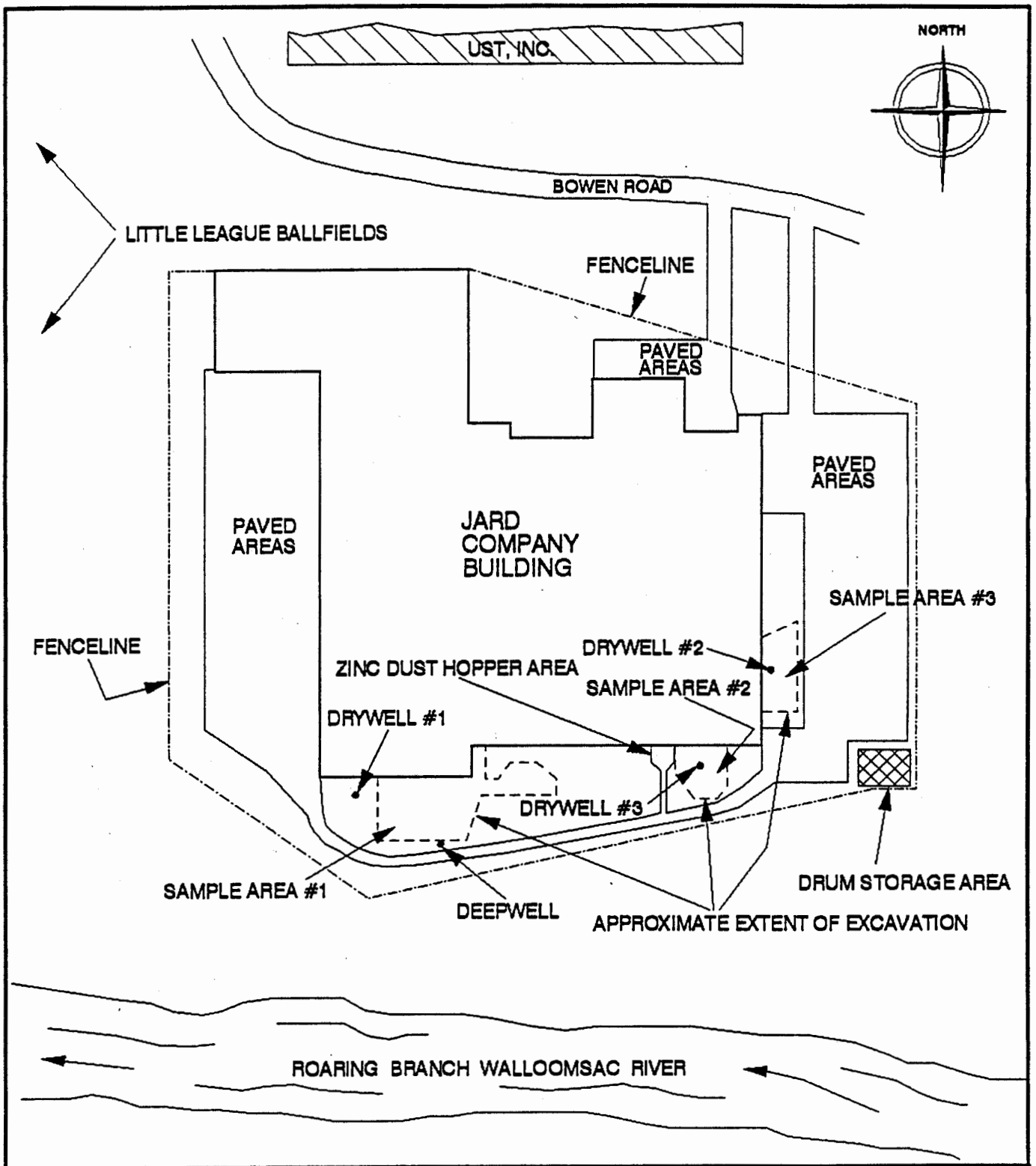
REGION I TECHNICAL ASSISTANCE TEAM

DRAWN	DATE	PCS #
DES	12/94	1114AAF1.DRW
APPROVED TCJ	DATE 12/94	TDD # 01-9412-12



NOT TO SCALE

FIGURE 2
SITE DIAGRAM
JARD COMPANY SITE
BENNINGTON, VERMONT

WESTON®
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REGION I TECHNICAL ASSISTANCE TEAM

DRAWN	DATE	PCS #
DES	12/94	1114AAF2.DRW
APPROVED TJ	DATE 12/94	TDD # 01-9412-12

and cleared areas encompass approximately 4 acres, while the remainder of the Site is wooded, and extends south to the Roaring Branch of the Walloomsac River.

The topography of the Site is generally level around the building. Southwestern portions of the building extend into excavated areas of a 40-foot high gravel bank beyond which the Roaring Branch of the Walloomsac River is located. A small seasonally flowing drainage swale begins in areas adjacent to the northwestern corner of the Site, and continues in a northwestern direction along Bowen Road.

During the PA/SI, stained areas of soil were noted next to southern and eastern exterior portions of the Site building. PCB screening analyses performed during the removal action indicated the presence of PCBs in these areas.

Also noted during the PA/SI, and addressed during the removal action, were the following features located outside of the Site building: two drywells; a concrete underground storage tank; and an aboveground steel storage tank; all of which are located in areas south of the building.

Prior to the Fund-lead removal action, the court-appointed trustee for Jard constructed a 6-foot high fence around the Site building to limit access. The fence remains intact and locked. Keys for access to the Site can be obtained from the Vermont Department of Environmental Conservation (DEC) or EPA representatives.

2.3 Cause of Release

Jard manufactured small capacitors, non-fluid transformers and motors from 1969 to 1989. The oil-filled capacitors were wound, assembled, impregnated with oil, degreased, tested and painted. The transformers were wound, assembled, varnished and tested. Originally, the capacitors were filled with PCB oil. At some time in the 1970s, Jard replaced the PCB oil with DOP[1] oil.

The facility's former hazardous waste coordinator indicated that prior to approximately 1987, non-contact process water, used in the production of capacitors, was fed from the facility into an underground cement tank located outside of the Site building. However, the process piping to the underground tank was not a closed system, and it was possible for employees to dump waste into this cement tank via raised floor drains. Therefore, the underground tank may have been contaminated with waste material, including PCBs.

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[1] DOP is also referred to as bis (2-ethylhexyl) phthalate or BEHP.

Also, prior to approximately 1987, paint spray booth waste water was fed into a drywell on the eastern side of the building.

Drums of new and used (generated waste) products associated with the manufacturing processes were observed during the PA/SI in the exterior storage shed located southeast of the Site building. These drums were found to contain both virgin and waste toluene, methyl iso-amyl ketone, 1,1,1-trichloroethane, and methanol.

Drummed wastes were being generated on the Site at the time of the facility's closing. The drummed materials found within the building consisted primarily of a mixture of DOP oil, cleaner, and wastewater (DOPCW). The former hazardous waste coordinator for Jard indicated that these drums were previously being shipped off of the Site as PCB contaminated waste. Prior to the facility closing, approximately 130 of these drums had collected and were not disposed of by Jard.

The former hazardous waste coordinator also stated that the aboveground storage tank contained waste DOP oil used in the production of the capacitors. The oil may be contaminated with PCBs. One of the dry wells was reportedly used for the subsurface disposal of paint spray booth wash water; the other dry well received the overflow from the underground tank.

Other waste streams generated at the facility included laboratory chemicals, powdered zinc for paint processes, waste capacitors, trichloroethylene, methylene chloride, waste paint solvent, oily speedy dry, paint sludge, and paint spray booth wash water.

Additionally, floor trench drains within the former production areas of the building were found to discharge directly into the soils beneath the slab foundation of the building.

2.4 The Initial Situation

In 1989, Jard ceased its manufacturing operations and filed for Chapter 7 bankruptcy (no reorganization). The court-appointed trustee for Jard, Lawrence H. Levy of Lawrence H. Levy, Inc., contracted Wehran Engineering, Inc. ("Wehran") to perform a Phase I Site Assessment. The purpose of the assessment was to conduct an environmental audit prior to a possible sale of the property.

The Phase I Site Assessment Report, completed in November 1989, stated that approximately 54 55-gallon drums and 25 5-gallon pails containing paints, solvents, thinners, degreasers, waste trichloroethylene, and other compounds remained outside of the facility in a fenced-in storage area. The report also stated that approximately 21 cubic yards of rejected capacitors filled with DOP oil remained at the Site.

The Report also identified the presence of a 12-inch by 24-inch floor drain inside the building. Also, 2 dry wells, a deep well, a cement underground tank of unknown size, and an approximate 2000-gallon aboveground storage tank, were identified outside the building.

The analytical results from a sediment sample collected by Wehran in the dry well on the east side of the building had concentrations of 11,500 ppm zinc, 280 ppm PCBs, 810 ppm DOP, 12 ppm toluene and 1.3 ppm ethylbenzene. A sample from the dry well on the south side of the building had concentrations of 191,000 ppm zinc, 98 ppm PCBs and 1,400 ppm DOP. A sediment sample collected from the 12-inch by 24-inch floor drain located inside the warehouse had concentrations of 753 ppm zinc, 4,900 ppm PCBs, 36,000 ppm DOP, 2 ppm trichlorethylene and 1 ppm 1,1,1-trichloroethane.

Nine soil samples were also collected by Wehran from areas outside of the Site building. The maximum concentrations of compounds detected in the soil samples are listed below.

Compound	Concentration (ppm)
Zinc	466,000[2]
DOP	30,000
PCBs	820
Trichloroethylene	4

Mr. Levy also contracted Wehran to perform a Phase II Site Assessment. The report for this assessment was submitted in February 1991. The assessment consisted of the excavation of six test pits and the installation of five monitoring wells. One of the six test pits had soil contamination significantly higher than the other five. The sample from this test pit contained 3,000 ppm DOP, 2,600 ppm zinc, 77 ppm PCBs, and 3 ppm toluene.

Similarly, one monitoring well (adjacent to the above-mentioned test pit) had significantly higher concentrations of contaminants than the other four. The well sample contained an oil layer above the water layer. The water layer contained 110,000 ppm DOP, 390 ppm PCBs, 3 ppm zinc, and several VOCs ranging from 3 ppm to 24 ppm.

On March 11, 1991, Stan Corneille of the Vermont DEC requested that the EPRB perform a removal PA/SI to determine if the Site met the criteria for a removal action.

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[2]The natural levels of zinc in New England soils ranges from less than 5 ppm to 300 ppm, with an average concentration of 45 ppm. Reference: Conner and Shacklette (1975); Shacklette and Boesngen (1984).

In July of 1991, the Vermont DEC completed a Preliminary Assessment (PA) for submittal to EPA's pre-remedial personnel. The PA stated that an additional 138 drums were observed inside the building and that the aboveground storage tank "appeared to be full of liquid". The PA also stated that Jard was classified as a generator of hazardous waste.

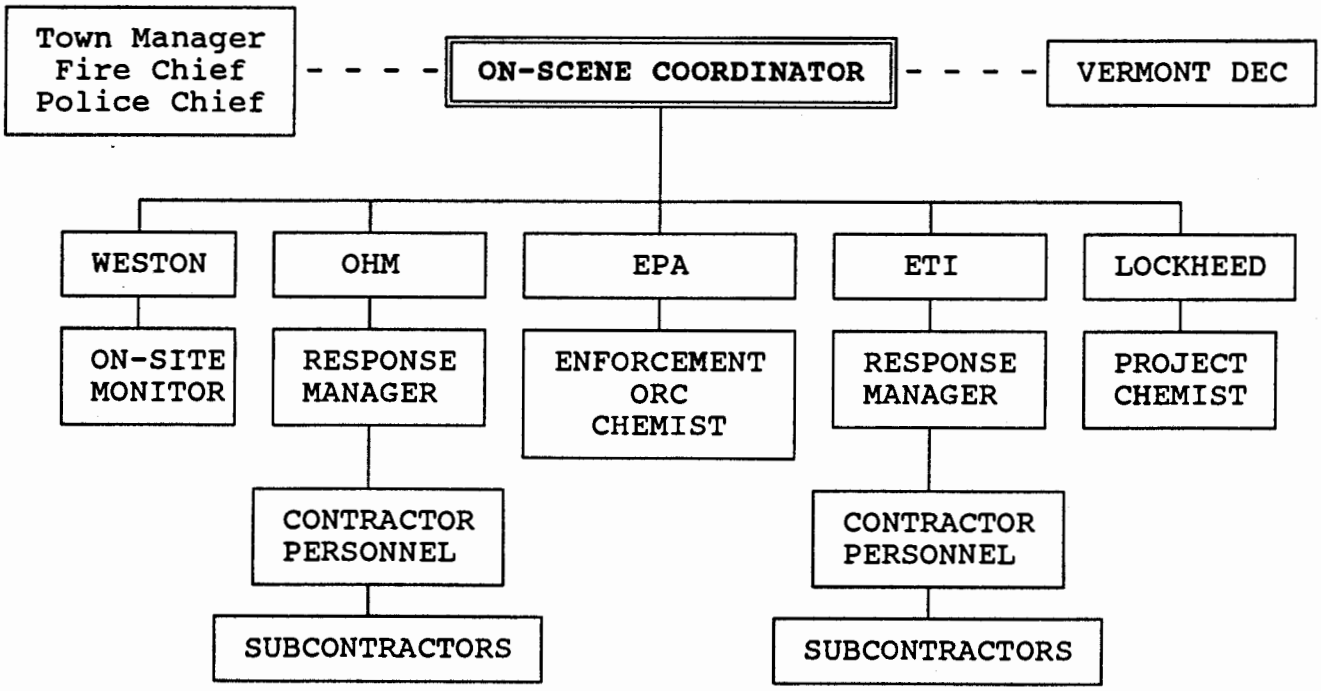
2.5 Efforts to Obtain Response by Responsible Parties

On August 8, 1991, EPA issued a Notice of Potential Liability and Invitation to Perform or Finance Proposed Cleanup Activities Letter ("Notice Letter") to Jard, care of Lawrence H. Levy, the court-appointed trustee. Mr. Levy indicated a willingness to continue performing activities required by the EPRB, and undertook several steps including fencing of the property and obtaining estimates from environmental consulting companies for drum disposal.

On October 28, 1991, EPA issued Mr. Levy a draft unilateral order detailing the required removal activities.

Mr. Levy was concerned that the time constraints on the proposed order were too stringent and would create difficulties in his administration of the estate. Mr. Levy was also concerned of his personal liability under the proposed order. On November 12, 1991, Mr. Levy resigned as trustee. In response to this development, the OSC determined that a Fund-lead removal would be performed at the Site.

2.6 Response Organization



2.7 Resources Committed

EPA resources committed during the removal action began accruing on August 2, 1991 and, based on information available as of December 1994, the estimated cost of the removal action is:

OHM:	$224,907
ETI:	$339,347
TAT:	$ 43,762
ESAT:	$ 6,350
EPA:	$ 87,405
TOTAL:	$701,771

Accounting Information:

Site ID #: L2
CERCLIS ID#: VTD048141741
OHM Delivery Order Number: 7445-01-061
ETI Delivery Order Number: 0026-01-005

Final estimated TAT costs are summarized by the following Technical Direction Documents (TDDs):

TDD# 01-9108-01:	$ 2,027
TDD# 01-9111-27, 27A, and 27B:	$26,614
TDD# 01-9210-06:	$11,900
TDD# 01-9412-12:	$ 3,221
TOTAL:	$43,762

In addition, the following estimated TAT costs were incurred during the Removal Site Evaluation:

TDD# 01-9103-07: $ 2,948

In accordance with EPA guidance, the TAT costs for the Removal Site Evaluation are not included in the estimated cost incurred for the removal action.

The EPA costs were based on a $30/hr estimate for direct labor costs plus $60/hr for indirect labor costs. Other direct costs include per diem, hotel charges and miscellaneous expenses.

2.8 Notification of Natural Resource Trustee

William Patterson of the Department of the Interior is designated as the Regional Environmental Officer, and is the liaison to the Natural Resource Trust. Mr. Patterson was informed of the removal action by receiving a copy of the Notice Letter sent to Mr. Levy dated August 8, 1991. He was kept informed of ongoing removal activities by receiving copies of all Pollution Reports (POLREPs).

2.9 Natural Resource Trustee Assessment and Restoration Activities

The OSC is not aware of any federal or state trustee damage assessment or restoration activities being performed. These activities do not appear to be necessary.

2.10 Chronological Summary of Activities

March 19, 1991

EPA SI Mary Ellen Stanton and personnel from TAT performed a Removal PA/SI to determine if a removal action was warranted. The investigation included sampling two drums, collecting six soil samples and one water sample. Site features such as tanks and drywells, and an outside hazardous waste storage area, which were previously noted in the Wehran report, were also observed. Entry was not made into the Site building.

April 1, 1992

The SI received the analytical results from the PA/SI which:

- Confirmed the presence of toluene in one of the drums in the hazardous waste storage area.
- Confirmed the presence of high levels of DOP, PCBS and zinc in the surface soils.

May 28, 1991

Based on visual observations and the analytical data obtained from the PA/SI, SI Stanton completed a memo to the Site File which concluded that "The Removal Site Evaluation has led to the determination that a removal action is appropriate at this time."

July 23, 1991

OSC Tagliaferro conducted a site visit and estimated that there were approximately 174 55-gallon drums within the Site building. The OSC also noted that a majority of the drums were labelled with corrosive, PCB, or ORM-E hazardous waste labels. Also identified within the building were six storage tanks ranging in size from approximately 2,000 to 10,000-gallons. These tanks were reported by the former hazardous waste coordinator of Jard to contain DOP oil, but previously (1970s) contained PCB oil.

August 8, 1991

A Notice Letter was sent to Jard Company, c/o Mr. Lawrence H. Levy, the court-appointed trustee for the bankrupt company.

August 15, 1991

EPA Deputy Regional Administrator Paul Keough signed an Action Memorandum authorizing $1,500,000 for the initiation of a Superfund removal action at the Site.

August 20, 1991

The trustee for the Site responded to the Notice Letter and indicated a willingness to perform activities required by the EPRB to mitigate emergency conditions at the Site. For the next 6 weeks, the trustee negotiated with the EPRB over specific activities to be performed at the Site, and on October 10, 1991, EPA sent a draft scope of work to the trustee outlining required removal activities.

August 29, 1991

EPA issued a delivery order for $250,000 to EPA Region I's ERCS Contractor, OHM.

September 30, 1991

The OSC and a Response Manager (RM) from OHM performed a site visit to assess potential response approaches and options at the Site in the event that a Fund-lead removal action was required.

October 24, 1991

In response to EPRB requirements, the trustee hired C.M. Laboratories, Inc. of Portland, Maine, to perform the following: assess and price removal costs for materials in the containers located at the Site; and, move all drums and containers with contents which were located outside of the building into the building to minimize public access. This included drums and containers from the southeastern shed, drums of purge and decontamination water from monitoring wells, and drums from a small shed on the western side of the Site building.

Drums were staged within the building based on label information. Additionally, C.M. Laboratories, Inc. personnel labelled containers with preliminary compatibility groupings.

Ideal Fence and Fuels Company personnel, under contract to Laurence H. Levy, constructed a 6-foot fence around paved areas of the Site.

TAT member David Strzempko was on site to document and monitor these activities.

October 28, 1991

EPA EPRB issued a draft unilateral order to the trustee detailing the required response activities.

November 12, 1991

The trustee resigned, and the OSC determined that a Fund-lead removal action would be performed at the Site. The EPA case attorney determined that the access agreement signed by the trustee was no longer valid, and began pursuing a warrant from the U.S. Court system to allow access.

December 21, 1991

Sections of plumbing in the Site building ruptured as a result of water freezing and thawing within the lines. This occurred because heat was no longer being supplied to the building during very cold weather.

December 23, 1991

In response to a telephone call from the Bennington Police Department, the OSC and an OHM RM responded to the Site to assess conditions within the building. Heavy water damage had occurred, and the building's sprinkler system was inoperable because of ruptured feed lines. The staged drums and bulk containers within the building did not appear to be affected.

The OSC determined that the potential for an uncontrolled fire within the building compounded the threat of a release. Based on this, combined with previously noted vandalism in the building, the OSC directed OHM to hire a security guard to restrict access, and to provide an early reporting system in the event of a fire.

December 24, 1991

The OSC determined that response actions could not be further delayed at the Site and directed OHM to restored power, natural gas (for heat) and telephone service to the building. This was accomplished by the end of the day. Plans were made to mobilize EPA, TAT and OHM personnel to the Site on January 6, 1992.

OHM subcontracted Wackenhut Guard Services, Inc., to provide 24-hour/day security.

December 30, 1991

An OHM Project Control Technician (PCT) mobilized to the Site to perform site preparation activities including arranging office trailer delivery and service hook-up, as well as to secure equipment which would be needed to perform the removal action.

December 31 to January 5, 1994

The PCT coordinated site preparation activities, including the delivery of office trailers and obtaining bids from potential suppliers and vendors.

January 6, 1992

TAT member David Strzempko mobilized to the Site and met with the Wackenhut security guard. The OHM PCT was currently set up in the Site building because the two trailers were still being hooked up for electricity. An OHM chemist was also present at the Site. A forklift had been delivered to the Site a day earlier for use in drum movement.

An OHM RM and foreman arrived in a 1-ton truck. TAT copied dispatches listing the truck's contents for reporting of equipment/expendables, and materials were checked as they were unloaded.

Two additional OHM Recovery Technicians (RTs) mobilized to the Site in a van bearing additional equipment/expendables which were checked and logged in by TAT. The EPA OSC also mobilized to the Site.

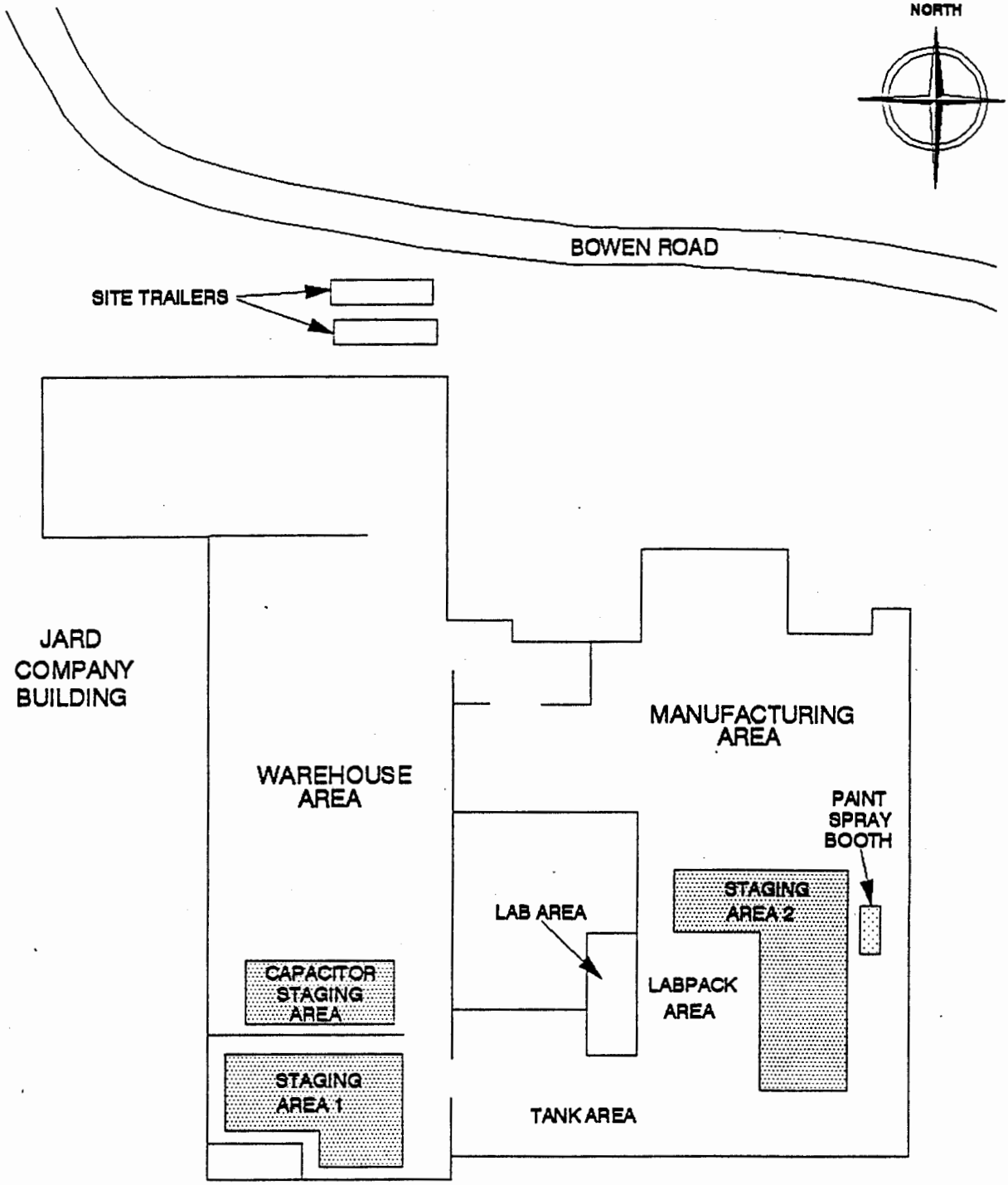
At the end of each day, while EPA, ERCS and TAT personnel were on site, the building was secured and Wackenhut security personnel were present during all non-working hours.

January 7, 1992

TAT performed initial rounds of air monitoring with a Foxboro OVA 128 organic vapor analyzer, an MSA model 260 combustible gas indicator/oxygen meter, and a Victoreen Thyac III radiation meter. No readings were encountered on the instruments above background levels. Air monitoring logs and location maps are referenced in the Project Support File which can be found at the EPA New England Regional Laboratory, 60 Westview Street, Lexington, Massachusetts.

Exclusion zones, decontamination areas and support zones were set up and delineated using caution tape. OHM workers cleaned areas where the forklift would be operating, and cleared a drum staging area in the southwest corner of the warehouse building. See Figure 3 - Drum Staging Area Diagram, for a depiction of the staging areas within the building. After the area was cleared, two workers unloaded drums stacked on pallets from a garage in the southwestern most corner of the building and began placing them on pallets in Staging Area 1. Sixty-five drums were staged, and based on labelling information, were thought to contain primarily DOPCW.

The remainder of the OHM crew proceeded outside and began placing empty drums into the fenced storage area located southeast of the



NOT TO SCALE

FIGURE 3
DRUM STAGING AREA DIAGRAM
JARD COMPANY SITE
BENNINGTON, VERMONT

WESTON®
MANAGERS DESIGNERS/CONSULTANTS
REGION I TECHNICAL ASSISTANCE TEAM

DRAWN	DATE	PCS #
DES	12/94	1114AAF3.DRW
APPROVED TCJ	DATE 12/94	TDD # 01-9412-12

building. The drums being moved were previously located outside of the fenced storage area on their sides, and apparently were presumed empty by former Jard workers. While performing this task, 26 55-gallon steel drums and three 5-gallon plastic pails were found to be 1/4 to 1/2 full of contents. The partially-full drums were staged in the manufacturing area of the Site building along with drums previously collected from the exterior shed (Staging Area 2).

January 8, 1992

OHM workers began to collect drums with contents from scattered areas within the Site building. Drums believed to contain DOPCW were moved to Staging Area 1, while all other drums were placed in Staging Area 2. TAT performed air monitoring prior to entry into each new building area to establish levels of personal protection equipment (PPE).

New England Telephone installed phone service in the Site trailers, and the OSC notified the Bennington Fire and Police Departments of site activities. TAT verified the drive time to the Southwestern Vermont Medical Center and provided the emergency room Coordinator with a copy of material safety data sheets (MSDS) for known chemicals on the Site.

After outlying drums were staged in one of the two staging areas, OHM workers began collecting scattered pallets of capacitors. These were placed next to Staging Area 1. Remaining OHM workers began staging containers of 1-gallon or less into the laboratory area.

A plumber contacted by OHM arrived on the Site to determine options for restoring limited water service to the building. This was needed to provide decontamination showers. The plumber determined that repairing the sprinkler system would be extremely expensive. Therefore, the OSC decided not to repair the sprinkler system, but opted instead to provide water for emergency showers by tapping directly off of the water main where it entered the building. This prevented water from reaching the damaged piping.

An electrician was on site to arrange proper grounding of telephone lines within the trailers.

The OSC contacted the former hazardous waste coordinator for Jard and asked additional questions about waste streams within the building. The worker later arrived on site and went through each area, describing what the tanks and a limited number of drums contained prior to the facility's closure. The former employee stated the following with regard to the inside storage tanks:

- Tank #1: Horizontal, approximately 5,000 gallons, "clean DOP"

- Tank #2: Vertical, approximately 2,000 gallons, "dirty DOP"
- Tank #3: Vertical, approximately 1,000 gallons, IPBP[1]
- Tank #4: Vertical, approximately 1,000 gallons, IPBP
- Tank# 5: Vertical tank, unknown volume, Monsanto sand filter for DOP.
- Tank #6: Horizontal, approximately 10,000 gallons, "raw DOP"
- Tank #7: Vertical green tank, approximately 30 gallons, sand filter for IPBP
- Tank #8: Vertical green tank, approximately 30 gallons, sand filter for DOP

The former employee also described the manufacturing process, the Jard hazardous waste numbering system, and he also informed the OSC that the floor trenches are open to the ground and drain into the soil.

By the end of the day, an additional 74 drums were moved to Staging Area 1, approximately 20 pallets of capacitors were staged next to the drums, an additional 20 drums were moved to Staging Area 2, and approximately 100 small (one gallon capacity or less) containers were staged in the laboratory area which was located in a small room to the west of Staging Area 2.

January 9, 1992

OHM workers prepared to sample staged drums. Exclusion, decontamination, and support zones were cordoned off. Evacuation maps and emergency phone numbers were posted in support zones.

Pallets with spill containment materials, plastic, and fire extinguishers were placed near work areas at five locations in the Site building. First aid kits were placed in the support zone and in one of the trailers.

While breathing air lines and decontamination areas were prepared, all of the drums in Staging Area 1 were numbered.

OHM crew members began sampling the numbered drums in Staging Area 1 utilizing level B PPE. Twenty-two drums were sampled out of the 154 drums staged there. Samples consisted of two 8-ounce jars which were labelled with the drum number, date of sample, sampler, preservative, and project code number. Additionally, drum logs were completed for each drum sampled. Air monitoring was performed both prior to, and during sample activities, to ensure the proper location of the site control zones.

The OSC met with Bennington Fire Chief Troy Joseph, Assistant Chief A.J. Slocum, and Bennington Hazardous Waste Coordinator Mick

[1]IBPB is isopropyl biphenyl oil

Goldsmith. Discussion focussed primarily on providing the Fire Department copies of MSDSs, and locations of drums within the building.

January 10, 1992

OHM's crew resumed sampling in Staging Area 1. An additional 96 drums were sampled. A facsimile machine and copier were delivered for site use under a rental agreement.

All gear was secured for the weekend, and sample areas were cordoned off with caution tape. Twenty-four hour/day security was scheduled for the weekend, and guards were informed of areas to avoid during their rounds.

January 13, 1992

The OSC provided the Bennington Fire Department with a list of the labelled drums or bulk containers and a reference map identifying their locations.

Site Evaluation and Response Section I Chief David McIntyre was on site to view activities.

In addition to TAT member Strzempko performing periodic air sampling rounds, OHM had obtained an MSA combustible gas indicator and an HNU photoionization detector for continuous air monitoring during sample operations. At the end of the day, OHM had sampled the remaining 36 drums in Staging Area 1.

January 14, 1992

The OSC, the EPA case attorney and an attorney from the Department of Justice met in Burlington, VT, and with the assistance of the U.S. Attorney's Office, requested that the U.S. Magistrate sign an Administrative Warrant authorizing EPA access to the Site for 90 days. The magistrate signed the Warrant.

OHM's crew moved the sample support zone from Staging Area 1 to Staging Area 2. The chemist began numbering drums in Staging Area 2, maintaining consistency by resuming with number 155.

Remaining OHM crew members proceeded to the paint spray booth machine (PSBM) located to the east of Staging Area 2. Bilge pumps were used to drain wastewater from the machine. Three 55-gallon drums were filled with the liquid waste and numbered.

January 15, 1992

OHM started drum sampling in Staging Area 2. Fifty-four samples were collected, while 11 drums with factory seals intact were left for possible disposal by the manufacturers.

January 16, 1992

The OSC discovered Jard's waste inventory sheets which identify the contents of the drum by drum number.

TAT member Strzempko began preparing a Lotus table to track all drums which were numbered on the Site. The table contained information including EPA number, Jard number, Jard waste stream, and tentative EPA waste stream. An additional table was also begun which listed drums that were removed from the Site, bulked, or found to be empty.

OHM removed sludge from the bottom of the PSBM and placed it into a 55-gallon.

Mark Roi from the Vermont DEC Hazardous Waste Division visited the Site to obtain a status report on the cleanup proceedings.

An additional 40 drums in Staging Area 2 were sampled. OHM's crew began sampling the 26 half-full or less drums and the three 5-gallon pails brought into the building from southeast exterior portions. After sampling, it was noted that six of the 26 drums were empty, and all three 5-gallon pails had contents.

January 17, 1992

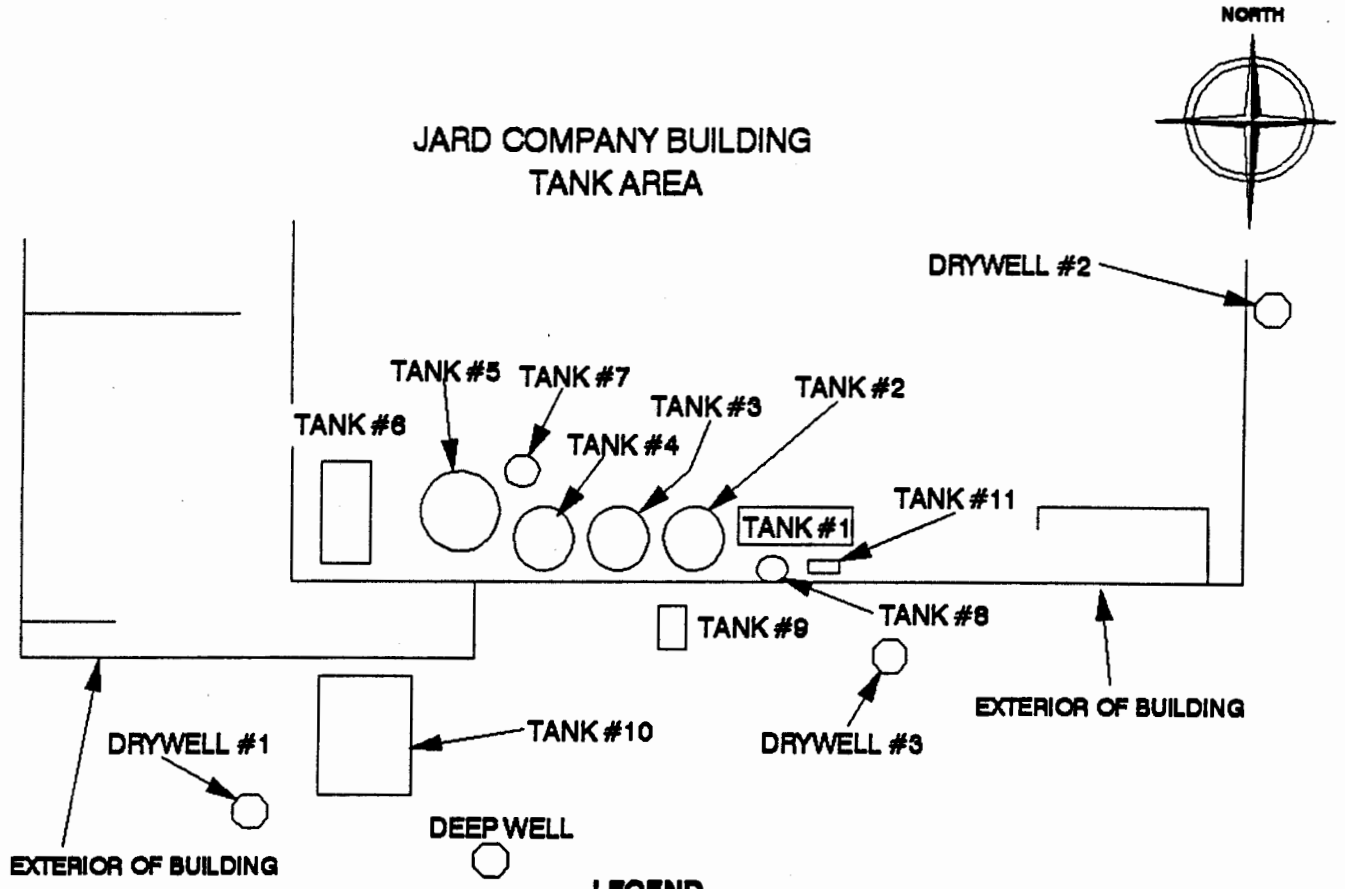
The six drums found to be empty in Staging Area 2, were moved outside to the southeastern shed.

All of the bulk storage tanks on the Site were numbered. See Figure 4 - Tank Location Diagram, for the tank numbers, locations and approximate sizes.

After numbering the tanks, OHM crew members sampled tanks #2, #3 and #4 from valves located at the base of each tank. Tank #1 was sampled from a manway opened on the top of the tank. Tank #6 was sampled from level gauge tubing running along the side of the tank since access to the top of the tank would have compromised safety. The OHM chemist completed tank logs for all tanks numbered. Tank #9, located outside of southern portions of the Site building, was not sampled at this time.

Tables were covered with plastic and were set up within the manufacturing area just outside of the laboratory for segregation and staging of laboratory containers.

The building was secured and 24-hour/day security was instituted for the weekend.



LEGEND

	VOLUME* (GALS.)	CONTENTS* (GALS.)
TANK #1: HORIZONTAL CYLINDER 8-FOOT DIA. BY 15-FOOT LENGTH.	5640	1988
TANK #2: VERTICAL CYLINDER 6.5-FOOT DIA. BY 11-FOOT HEIGHT.	2728	<500
TANK #3: VERTICAL CYLINDER 4.5-FOOT DIA. BY 12-FOOT HEIGHT.	1416	<128
TANK #4: VERTICAL CYLINDER 4.5-FOOT DIA. BY 12-FOOT HEIGHT.	1416	428
TANK #5: VERTICAL CYLINDER 3.5-FOOT DIA. BY 14.5-FOOT HEIGHT.	1030	0
TANK #6: HORIZONTAL CYLINDER 10-FOOT DIA. BY 16-FOOT LENGTH.	10566	475
TANK #7: VERTICAL CYLINDER 2.75-FOOT DIA. BY 5-FOOT HEIGHT.	174	55
TANK #8: VERTICAL CYLINDER 2.75-FOOT DIA. BY 5-FOOT HEIGHT.	174	55
TANK #9: HORIZONTAL CYLINDER 5-FOOT DIA. BY 12-FOOT LENGTH.	1752	1200
TANK #10: UNDERGROUND CONCRETE RECTANGULAR TANK 6-FOOT DEPTH BY 17.3-FOOT LENGTH BY 20.3-FOOT LENGTH.	15820	8789
TANK #11: VERTICAL CYLINDER 3-FOOT DIA. BY 3.3-FOOT HEIGHT.	173	110
DRYWELL #1: UNDERGROUND CONCRETE VERTICAL CYLINDER 6-FOOT DIA. BY 3-FOOT LENGTH.	635	5
DRYWELL #2: INFORMATION COULD NOT BE OBTAINED.	NA	NO LIQUIDS
DRYWELL #3: INFORMATION COULD NOT BE OBTAINED.	NA	NO LIQUIDS
DEEP WELL: UNDERGROUND CONCRETE VERTICAL CYLINDER 6-FOOT DIA. BY 14-FOOT LENGTH.	NA	NA

* = INFORMATION ON TANK VOLUMES AND CONTENTS WAS OBTAINED FROM TANK LOG SHEETS COMPLETED BY OHM.

NOT TO SCALE

FIGURE 4
TANK LOCATION DIAGRAM
JARD COMPANY SITE
BENNINGTON, VERMONT

WESTON®
MANAGERS DESIGNERS/CONSULTANTS
REGION I TECHNICAL ASSISTANCE TEAM

DRAWN	DATE	PCS #
DES	12/94	1114AAF4.DRW
APPROVED TCJ	DATE 12/94	TDD # 01-9412-12

January 20, 1992

The OHM crew and chemist began segregating containers from the laboratory onto the previously staged tables. Based on label information, the following divisions were made: flammables; non-flammables; acids; oxidizers; poisons; inorganic liquids; inorganic solids; shock sensitive materials; and unknowns.

Approximately 583 small containers of 5-gallon capacity or less were taken from the laboratory area and staged on the prepared tables. Four hundred sixty-one of the containers had labels and the OSC decided to dispose of these containers within labpacks. Forty-three of the containers with no labels were bulked into a single 55-gallon drum based on their similar chemical characteristics, and 79 unlabelled containers were scheduled to be crushed, consolidated and solidified. Information on the containers, such as manufacturers and chemical names, were copied by the OHM chemist for laboratory pack bid request purposes.

An electrician was brought on site to repair the heater in the west side of the building. A fuse and a motor had to be replaced.

January 21, 1992

OHM workers opened several capacitors and drained their oils into two sample jars for PCB analyses. This was performed to determine if oil within the capacitors contained PCBs at concentrations greater than 50 ppm.

Remaining crew members completed scraping of the PSBM walls and removing sludge from the tank. Two additional drums were generated and numbered. One of the drums contained solids, while the other contained liquid.

TAT member Strzempko compared the list of laboratory containers to the available MSDSs from the facility. Copies were made of applicable available MSDSs.

Scott Clifford, EPA chemist, and John Mirisola, a contractor from Lockheed, Inc. working under the Environmental Services Assistance Team (ESAT) Contract, arrived at the Site to screen soil samples for PCB concentration utilizing an AID gas chromatograph equipped with an electron capture detector (ECD).

A rented backhoe was brought to the Site for excavating soils and uncovering a drywell and a suspected underground storage tank located behind southern portions of the Site building.

January 22, 1992

The OSC and TAT member began sampling the floor drain and floor trenches within the southwestern corner of the Site building

(samples A001 through A004) for on-site PCB screening. See Figure 5 - Drain, Trench, and Drywell Sample Location Diagram, for these locations.

OHM crew members proceeded to attempt to sample tank #9, which is located outside of the Site building, however the sludge sampler was unable to collected a representative sample. This occurred because there was approximately 6 inches of a red oil underlain by frozen material within the tank.

The cover on the drywell located south of the Site building (labelled dry well #1), was taken off with the backhoe and soil samples were collected for on-site PCB screening. A sample of surface soil (A005) was collected within the bottom of the drywell. The sample was located approximately 3 feet below the ground surface surrounding the drywell. Ice beneath the soil in the drywell was broken using the backhoe, and an additional soil sample (A006) was collected at a depth of approximately 1-foot deeper than the first sample.

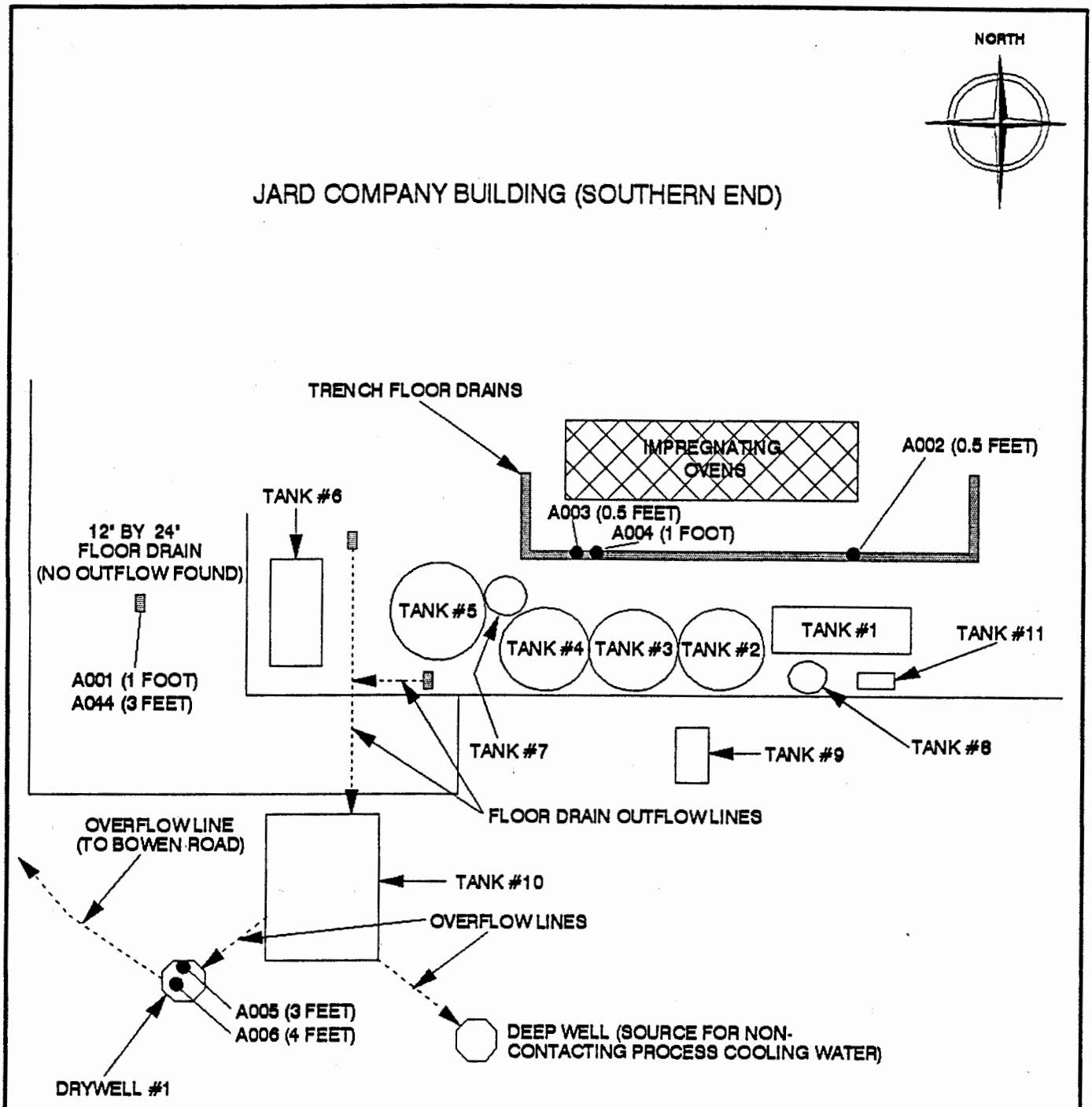
A well located south of the Site building was labelled a deep well. It had a manhole cover on it which was removed, and the water level in the well was observed to be approximately 6 feet below ground level. This depth was consistent with previous groundwater measurements in the area. According to Jard's former hazardous waste coordinator, the well was used to provide non-contact process water to the facility.

The OSC selected three areas for surface soil sampling (see Figure 6 - Surface Soil Extent of Contamination Sampling Diagrams). The objective of the surface soil sampling was to define the lateral extent contaminated surface soil with concentrations above 25 ppm PCBs. The OSC used the Wehran Phase I and Phase II reports, as well as EPA's Removal PA/SI to select these three areas.

The OSC and TAT member Strzempko proceeded to Sample Area 1. Sample locations were marked using 5-foot by 10-foot grid intersection points. Initial soil samples were collected by scraping the ground with teeth on the backhoe bucket. This was necessary since frost extended into the ground for approximately 2-3 feet.

After initial samples were collected from Sample Area 1, excavation was initiated in the areas adjacent to the fill and vent pipes using the backhoe. This was performed because it was assumed that an underground storage tank was located beneath the piping. Once uncovered, the tank's size and it's contents could be assessed. Due to the frost, excavation was extremely difficult.

The top corner of a concrete tank was encountered laterally within 2 feet of the fill and vent pipes, at a depth of approximately 2 feet. The OSC directed the backhoe operator to follow the southern

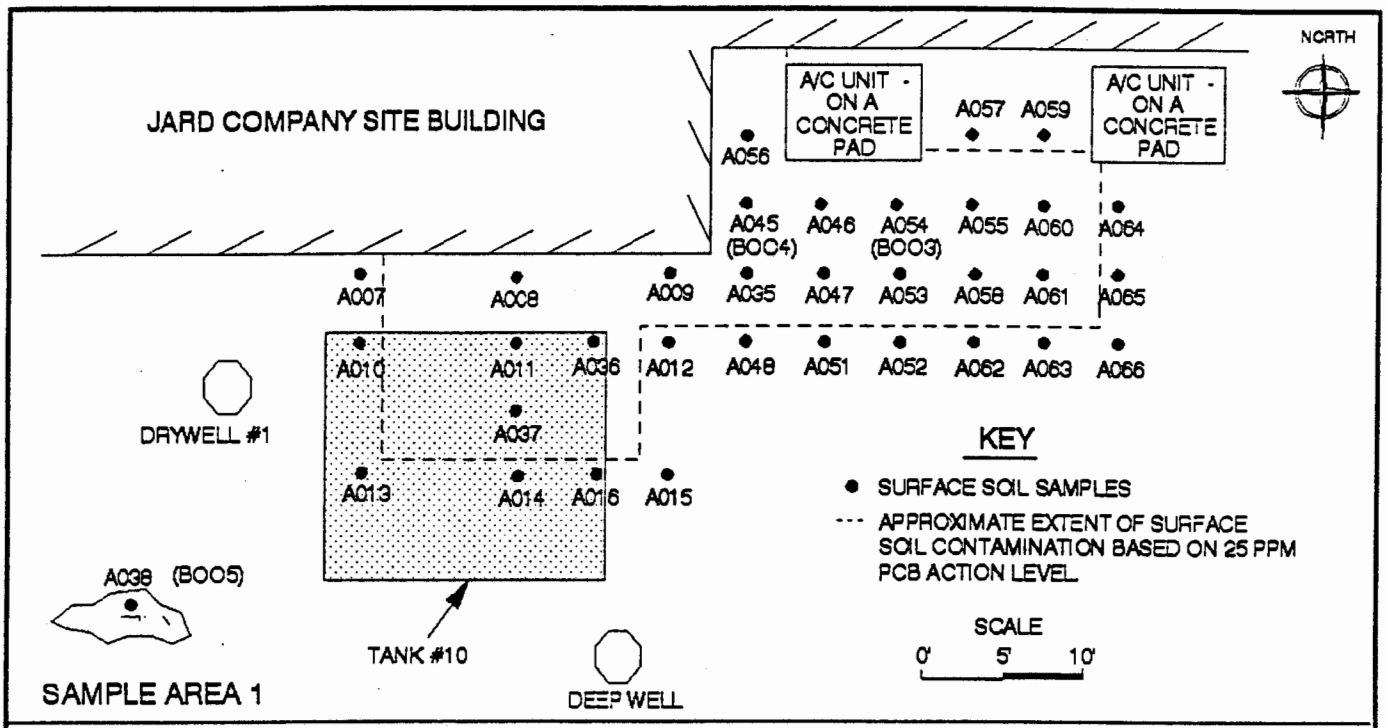


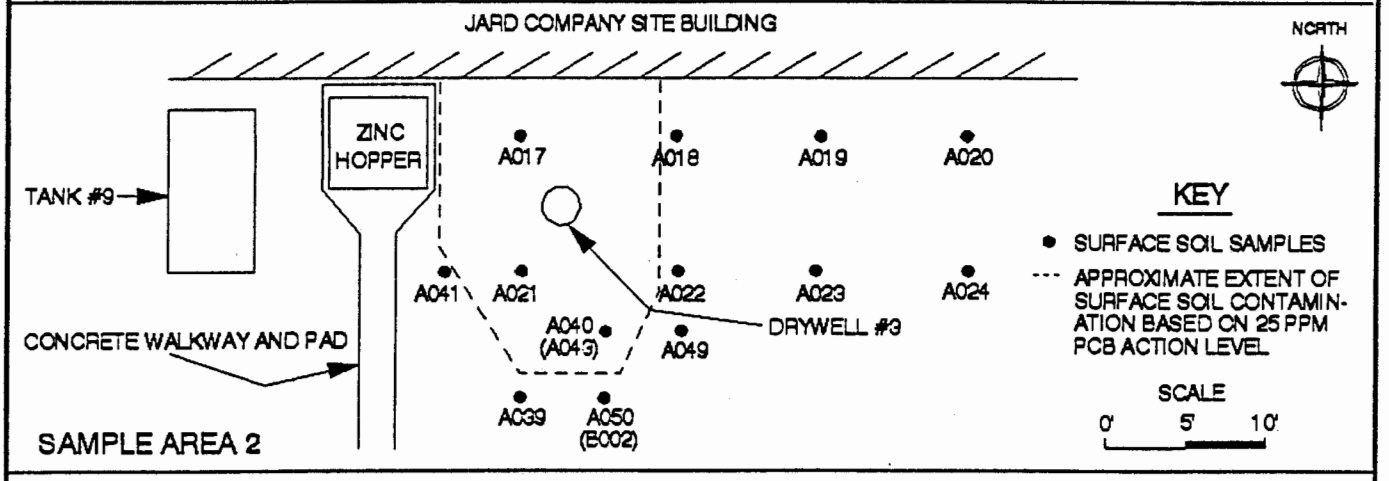
NOT TO SCALE

FIGURE 5
DRAIN, TRENCH AND DRYWELL
SAMPLE LOCATION DIAGRAM
JARD COMPANY SITE
BENNINGTON, VERMONT

WESTON®
MANAGERS DESIGNERS/CONSULTANTS
REGION I TECHNICAL ASSISTANCE TEAM

DRAWN DES	DATE 12/94	PCS # 1114AAF5.DRW
APPROVED TCJ	DATE 12/94	TDD # 01-9412-12





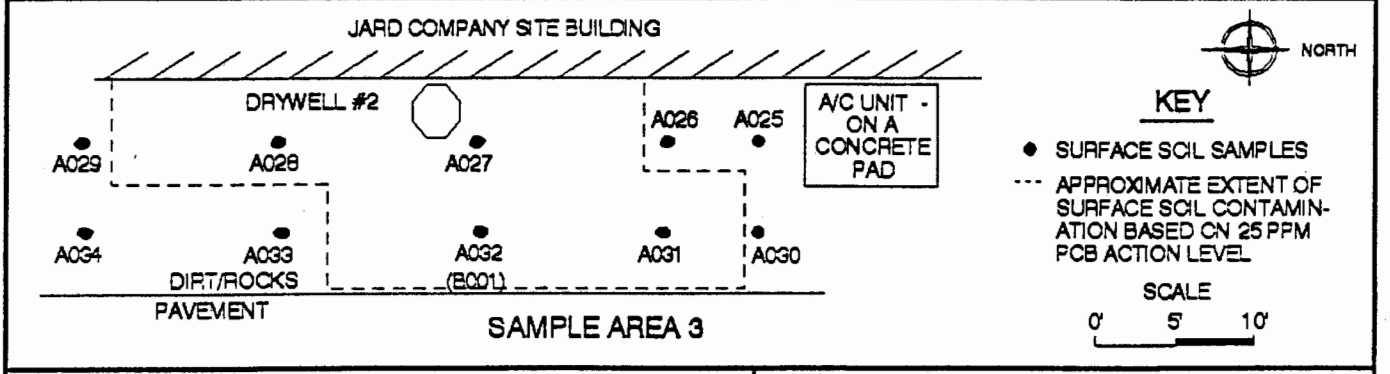


FIGURE 6
SURFACE SOIL EXTENT OF CONTAMINATION SAMPLING DIAGRAMS
JARD COMPANY SITE
BENNINGTON, VERMONT

WESTON®
MANAGERS DESIGNERS/CONSULTANTS
REGION I TECHNICAL ASSISTANCE TEAM

DRAWN DES	DATE 12/94	PCS # 1114F6.DRW
APPROVED TCJ	DATE 12/94	TDD # 01-9412-12

side of the tank in a westerly direction. Since the tanks presence was confirmed, a number was assigned, and it was logged in as tank #10. The southern side of the tank was found to extend for 17.3 feet in a westerly direction. The OSC then directed the backhoe operator to delineate the eastern edge of the tank by excavating in a northerly direction. Approximately 6 feet along the eastern edge of the tank, a section of the backhoe bucket blade cracked.

Since the backhoe was disabled and heavy digging could not be completed, the OSC decided to sample soils south of the Site building and east of the zinc dust hopper (Sample Area 2). Samples were collected using similar methods to Sample Area 1 although the grid was altered to a 10-foot by 10-foot configuration.

Prior to leaving for the evening, OHM workers placed five bails of hay down within the tank excavation to prevent further frost permeation.

January 23, 1992

While waiting for a welder to arrive at the Site to repair the backhoe bucket, the OSC and TAT member Strzempko collected soil samples on the eastern side of the building near a drywell associated with the PSBM (Sample Area 3). The backhoe teeth were again used to loosen soil samples collected at the intersections of a 5-foot by 10-foot grid system.

As part of the soil sampling activities, TAT collected background soil samples from areas along the banks of the Roaring Branch of the Walloomsac River, south of the Site facility.

OHM workers removed soil from the 12-inch by 24-inch floor drain located in the southwest corner of the Site building, to a depth of approximately 3 feet below the grade of the slab foundation. Soil removal beyond this depth was impossible without removing the building slab. The soil was placed in a drum. Although the drain was originally thought to connect into the drywell #1, located outside of southern portions of the facility, no piping was observed and it appeared that the drain discharged directly into soils beneath this portion of the building. An additional soil sample was collected at depth of 3 feet within the drain (A044) to document the contamination that remained.

The backhoe bucket was repaired by a welder, and the OHM backhoe operator resumed locating the eastern side dimensions of storage tank #10. Once the northeastern corner of the tank was located, the tank was found to measure 20.3 feet by 17.3 feet on the surface. OHM collected a sample through the tank vent pipe. OHM also estimated that the tank was 6 feet deep, with 3.6 feet of liquid inside. Therefore, the tank was assumed to have approximately 16,000 gallons of capacity with approximately 9,000 gallons of liquid inside of it.

OHM crew members prepared for gross decontamination of machinery which was believed to be most affected by the past use of PCBs in the building. A sodium hydroxide based cleaner called SW-1000™ (SW-1000) was obtained to reduce PCB concentrations on impermeable and semi-permeable surfaces. The product would be utilized by spraying it on affected machinery and flooring undiluted. After allowing the cleaner to act on contaminants, the product would be removed along with the gross contamination using a pressure washer. Liquid waste from the process would be vacuumed and drummed for sampling and disposal.

Portions of the following pieces of machinery were scheduled to be cleaned:

- Impregnator oven conveyor belt system
- Exterior of the drying machine and flooring

OHM personnel performed a test of the effectiveness of the SW-1000 on two small portions of the contaminated machinery. Wipe samples were collected on two areas of the impregnator oven conveyor belt system. The areas were then cleaned with rags soaked with SW-1000, and the areas were re-sampled. The wipe samples were given to the EPA chemist and analyzed for PCBs with the on-site gas chromatograph. The results were:

- W-1 (Before cleaning): 33 μg PCBs/cm^2
- W-1 (After cleaning): 0.20 μg PCBs/cm^2
- W-2 (Before cleaning): 33 μg PCBs/cm^2
- W-2 (After cleaning): 0.06 μg PCBs/cm^2

The sampling results indicated that the use of SW-1000 was sufficient for the purpose of performing a gross decontamination of equipment.

<u>January 24, 1992</u>

The OSC and TAT member Strzempko collected additional soil samples from each of the three sample areas to further delineate the lateral extent of surface soil concentrations with PCBs of 25 ppm or greater. Table 1 - Lateral Extent of Contamination and Drains/Drywell PCB Field Screening Results, summarizes all soil screening results for locations referenced on Figures 5 and 6. The OSC then terminated the extent of contamination survey and decided to complete the survey during the excavation phase of the removal. The OSC made this decision primarily because of the deep frost at the Site.

(NOTE: Table 1 also includes the extent of contamination sampling results for samples collected in October 1992.)

TABLE 1
LATERAL EXTENT OF CONTAMINATION AND DRAINS/DRYWELLS PCB FIELD SCREENING RESULTS

JARD COMPANY SITE
BENNINGTON, VERMONT
JANUARY 1992 AND OCTOBER 1992

SAMPLE STATION	GRID LOCATION	PCB RESULT (ug/gm)
A001	FLOOR DRAIN	*
A002	TRENCH DRAIN	335F (AV.)
A003	TRENCH DRAIN	130UF**
A004	TRENCH DRAIN	40UF**
A005	DRYWELL #1	8F
A006	DRYWELL #1	3F
A007	AREA #1	16F
A008	AREA #1	110F
A009	AREA #1	100F
A010	AREA #1	12UF
A011	AREA #1	94F (AV.)
A012	AREA #1	12F
A013	AREA #1	13F
A014	AREA #1	10F
A015	AREA #1	8UF
A016	AREA #1	18F
A017	AREA #2	38F
A018	AREA #2	12UF
A019	AREA #2	14F (AV.)
A020	AREA #2	12UF
A021	AREA #2	49F
A022	AREA #2	12UF
A023	AREA #2	12F
A024	AREA #2	12UF
A025	AREA #3	12UF
A026	AREA #3	12UF
A027	AREA #3	130F
A028	AREA #3	34F
A029	AREA #3	12UF
A030	AREA #3	12F
A031	AREA #3	63F
A032	AREA #3	250F
A033	AREA #3	15F

SAMPLE STATION	GRID LOCATION	PCB RESULT (ug/gm)
A034	AREA #3	12UF
A035	AREA #1	1300F
A036	AREA #1	50F
A037	AREA #1	25F
A038	AREA #1	69F
A039	AREA #2	12UF
A040	AREA #2	40F
A041	AREA #2	12UF
A042	BACKGROUND	12UF
A043	AREA #2	88F
A044	FLOOR DRAIN	450F
A045	AREA #1	>1990F
A046	AREA #1	150F
A047	AREA #1	42F
A048	AREA #1	12UF (AV.)
A049	AREA #2	12UF
A050	AREA #2	12UF
A051	AREA #1	12UF
A052	AREA #1	12UF
A053	AREA #1	12UF
A054	AREA #1	25F
A055	AREA #1	47F
A056	AREA #1	420F
A057	AREA #1	1UF
A058	AREA #1	10UF
A059	AREA #1	10UF
A060	AREA #1	110F (AV.)
A061	AREA #1	87F
A062	AREA #1	1UF
A063	AREA #1	10UF
A064	AREA #1	10UF
A065	AREA #1	10UF
A066	AREA #1	10UF

Note: Samples A001 through A055 were collected during January 22–24, 1992.
Samples A056 through A066 were collected on October 14, 1992.

* – Sample had massive interferences and PCB concentration was not reportable
** – Interferences in sample raised detection limit.
F – Data has been generated using field screening method.
Analytes are tentatively identified and concentrations are quantitative estimates.
U – The material was analyzed for but was not detected.
The associated numerical value is the field screening quantitation limit.
(AV.) – Average value.

The OSC and TAT member Strzempko collected five additional samples for confirmation analysis at an off-site lab. The EPA chemist took an aliquot from these samples and screened them on site for PCBs. The remainder of the sample would be sent to a low bid analytical laboratory for confirmation of PCB concentrations. The number of samples represented 10 percent of the field screened samples. Table 2 - Laboratory Confirmation Results Summary for Samples Collected in January 1992, presents the quantitative off-site laboratory results and compares them to the field screening values.

OHM workers drained oils from machines located in the southeast corner and south central portions of the Site building into three drums which were numbered and sampled. The machines were believed to be associated with the impregnation of oils into capacitors.

In lieu of repeatedly repairing heaters in western portions of the building, the OSC directed OHM to move all drums from Staging Area 1 to Staging Area 2. After completion of this task, any additional drums such as those generated during the machinery draining and washing processes, would be staged in this area.

Samples collected from capacitors earlier in the week were packaged and sent to Alpha Analytical Laboratories, Inc. (Alpha), in Westborough, Massachusetts for PCB analyses.

The building was secured and 24-hour/day security was instituted for the weekend.

January 27, 1992

OHM workers pumped all liquids from the drying machine and conveyor belt system into 10 drums which OHM labelled "Washer Machine Water".

Final preparations for cleaning exterior portions of machinery and associated floors underneath them included sweeping down these areas. Two drums of oily water and two drums of speedy dry were collected and numbered prior to washing down machinery with SW-1000. OHM's crew made berms with new speedy dry for capturing liquid runoff expected from the wash processes.

OHM workers began washing in the southwest portions of the building next to the bulk storage tanks, on the impregnator oven conveyor belt system. OHM workers collected two drums of liquid from the process and labelled them "Impregnator Machine Decon Water". The OSC decided that samples of liquids generated during washing would be composited based on each area that was cleaned and washed. Composite samples were to include a representative sample of the drums containing Washer Machine Water and Impregnator Machine Decon Water.

TABLE 2
LABORATORY CONFIRMATION RESULTS SUMMARY
FOR SAMPLES COLLECTED IN JANUARY 1992

JARD COMPANY SITE
BENNINGTON, VERMONT

Sample Station	Laboratory Results PCB (ug/gm)	Field Screening Results PCB (ug/gm)
B01*	42	260F
B02*	4	12UF
B03*	37	49F
B04*	3200	4700F
B05*	24	140F

* – Confirmatory analytical analyses was performed at Alpha Analytical Laboratories, Westborough, MA.

F – Data has been generated using a field screening method. Analytes are tentatively identified and concentrations are quantitative estimates.

U – The material was analyzed for but was not detected. The associated numerical value is the field screening quantitation limit.

PCB Aroclors 1016, 1221, 1232, 1242, 1248, 1254, 1260, and 1262 were analyzed for in both methods, but only Aroclor 1242 was detected.

January 28, 1992

OHM's crew continued washing exterior portions of the impregnator oven conveyor belt system. An additional two drums of liquid were generated during the process.

A welder was contracted to attach a blast shield to the backhoe. This was performed for crushing operations.

Drums with 1/4 contents or less, along with unknown laboratory materials, were moved to areas outside of the southwestern corner of the building for consolidation within the crush box (brought on site a day earlier).

Small laboratory containers were placed directly in the crush box, while drummed materials were poured into the box. The backhoe bucket was used to crush containers, and the ensuing liquid was solidified with vermiculite. The material was placed into two drums which were numbered and sampled. Seventy-nine small containers were crushed, while material from 18 drums with 1/4 contents or less were added during the crush operation.

OHM packaged and sent confirmatory PCB soil samples, which were collected on January 26, 1992, to Alpha for PCB and semi-volatile organic compound analyses.

January 29, 1992

OHM's crew decontaminated the backhoe and crush box using the pressure washer. After completing this task, the crew finished washing the impregnator oven conveyor belt system. An additional four drums of liquid were generated during the process.

The OSC bulked partially full drums of identical virgin products. This was performed primarily based on labelling, appearance, and chemical characteristics. Four partially full drums were bulked into drums containing like materials.

The OSC and OHM chemist reviewed a preliminary plan for waste stream identification of the materials found on the Site based on the available information. This was performed to reduce the total number of samples being sent for compatibility and disposal analyses. Based on the former Jard drum number and employee information, as well as appearance and chemical characteristics, the OSC decided to composite 124 drum samples of DOPCW into a single sample.

Tank #7 was drained into a 55-gallon drum. Tank #8 was also drained into a 55-gallon drum. Tanks #7 & #8 were reported by the former hazardous waste coordinator to contain raw isopropyl biphenyl and DOP oil respectively. Samples were collected from each tank for PCB analyses, since both tanks formerly held PCB oil.

Stainless steel tank #11 was drained of all free liquids. This process generated an additional two drums which were numbered and sampled for compatibility analyses.

A representative from Shapiro and Sons, Inc., a metal reclaimer from North Adams, Massachusetts was on site. He viewed several drums of zinc dust to determine if they could be reclaimed. The representative agreed to pick up several of the drums at no cost. The zinc dust was generated during coating operations, and was collected with a series of filters and a hopper connected to southern exterior portions of the Site building. Goretex™ filters and dirt containing zinc were also generated as waste during the coating operation. The dirt and zinc had been scooped up from areas around the hopper and placed in drums. The Shapiro and Sons, Inc. representative did not indicate an interest in the filters or dirt.

January 30, 1992

The OHM chemist began compositing DOPCW drum samples. Approximately 20 milliliters were collected from each of the 124 sample jars and placed in a 5-gallon plastic pail. Five representative 32-ounce jar were later collected from the pail; one to be sent for wastewater and incineration disposal analyses, and the other four were stored for the purpose of providing composite samples to potential disposal facilities.

OHM crews completed washing down exterior portions of the drying machine, and began a wash down of the underlying floors. Six drums of liquid were generated during the machine and floor washing process, and were labelled "Floor Decon Water" by OHM workers. OHM collected five composite samples by combining a representative portion from each drums into 32-ounce sample jars for each of the following tentative waste streams: Washer Machine Water, Impregnator Machine Decon Water, and Floor Decon Water.

The OHM foreman began arranging all of the drums in ascending numerical order into the following categories: DOPCW (based on Jard drum numbers); Impregnator Machine Decon Water; Washer Machine Water; Floor Decon Water; Paint Spray Booth Wash Water; Ring Pump Liquids (based on Jard drum numbers); Oily Speedy Dry; glassware; solids from crush box; and solvents and unknowns.

Shapiro and Sons, Inc. removed 10 35-gallon paper drums containing zinc dust from the Site.

NOTE: Appendix 3 - Waste Disposal Summary Table, lists the waste streams, proper shipping names, transporter companies used, disposal methods employed, quantity of materials disposed of, ship dates and manifest numbers for all materials shipped from the Site.

January 31, 1992

OHM's crew began to remove oily speedy dry and soil from floor trench drains. The trenches had piping from the tanks and surrounding machinery located in them. Scraping up and removing the oily speedy dry beneath the pipes within the trenches, indicated that they were open-bottomed to the ground beneath the concrete slab of the building.

OHM completed the staging of all drums. The building was secured, and 24-hour security/day was instituted for the weekend.

February 3, 1992

OHM workers completed cleaning out the floor trench drains. Oily speedy dry cleaned from the floor trench drains, floor drains and floors beneath the machinery, was placed into seven drums. A composite sample of these drums was collected for incineration disposal analyses.

OHM collected composite samples from each of the following tentative waste streams: Goretex™ Filters; Zinc and Dirt; and Oily Speedy Dry.

OHM solicited bids for laboratories to perform disposal and compatibility analyses. Disposal analyses was to be performed on samples from "known" waste streams, while compatibility analyses would be performed for drums of unknown materials.

Known waste streams were scheduled to have the following disposal analyses performed:

- Zinc and Dirt - landfill/incineration
- Goretex™ Filters - landfill
- Oily Speedy Dry - incineration
- DOPCW - wastewater treatment/incineration
- tank samples - incineration*

* Indicates that limited incineration parameters would be analyzed for because of known sample characteristics.

The following unknown composited waste streams and all "unknown drums" were scheduled to have compatibility analyses performed:

- Washer Machine Water
- Impregnator Machine Decon Water
- Floor Decon Water
- Ring Pump Liquids
- Paint Spray Booth Wash Water

Based on price and turn around time for results, OHM awarded Con-Test Laboratories of East Longmeadow, Massachusetts, the contract for analyses of composite samples.

A map showing the layout of all drums staged at the Site was completed by the OHM foreman. TAT member Strzempko checked the map for accuracy.

February 4, 1992

Darren Dawson, a representative from Astro Chemical, Inc., based in Rutland, Vermont, arrived on site to view factory sealed drums which bore their name on the labels. The drums included a 20-gallon carboy of hydrochloric acid, three 55-gallon steel drums of methyl alcohol, and one 55-gallon drum of 1,1,1-trichloroethane. Mr. Dawson agreed to send a truck to remove the drums on February 5, 1992.

P.D. George, Inc., a chemical manufacturer from St. Louis, Missouri, had been contacted by the OSC and agreed to pick up two factory sealed 55-gallon steel drums of 2-butoxy ethanol dimethylamine ethanol which bore their name on the labels. It had been arranged to have the drums picked up by Yellow Freight and brought to the Essex Corporation, a local distributor for P.D. George. When the Yellow freight driver arrived, he took the P.D. George, Inc. drums, and also dropped off 10 85-gallon plastic overpack drums ordered by OHM.

An OHM box truck arrived at the Site, and materials to be demobilized from the Site were loaded. As loading took place, TAT member Strzempko inventoried materials to be credited back to EPA. Enough expendables were left on site for drum removal operations. The foreman was demobilized with the box truck. Two of three site portable toilets were demobilized from the Site.

The drum log list was altered to include tentative waste stream and analysis type for all drums staged at the Site. See Appendix A - Interim Waste Stream Classifications For Drummed Material, for a complete listing of all the drums remaining on the Site as of this date, and the analyses they were sent for.

NOTE: Appendix B - Final Waste Stream Classifications For Drummed Material, is a complete listing of all drums and their final waste streams as determined by EPA.

February 5, 1992

All remaining composited samples were sent to Con-Test for analyses as indicated in Appendix A. OHM crews overpacked 5 drums with steel 85-gallon overpack drums, and 7 drums with plastic 85-gallon overpack drums. Three plastic overpack and 7 steel overpack drums were left on site as a precautionary measure.

A truck from Astro Chemical, Inc., based in Rutland, Vermont, was on site and removed the five factory sealed drums which bore their name on the labels.

All remaining OHM crew members demobilized from the Site.

TAT member Strzempko and OSC Tagliaferro demobilized from the Site.

February 14, 1994

OHM received analytical data for the samples of the oil collected from the capacitors. The analysis did not detect the presence of PCBs.

February 15 through March 16, 1994

OHM solicited bids for the transportation and disposal (T&D) of the materials in the lab pack list (laboratory containers of 5 gallons or less) and for the T&D of the capacitors to a non-RCRA, non-Toxic Substances Control Act (TSCA) regulated landfill. OHM awarded a subcontract to Laidlaw Environmental Services (Laidlaw) for the T&D of the laboratory containers and OHM awarded the subcontract for the T&D of the rejected capacitors to Waste Technology Services.

The OSC received disposal analysis for the samples collected from the tanks, underground vault and the "known drums". The OSC received the compatibility data performed on the "unknown drums". The OSC reviewed the compatibility data and determined that it was performed incorrectly. The OSC directed OHM to have the samples reanalyzed in accordance with proper procedures.

March 17, 1992

A crew from OHM consisting of a foreman, two RTs, and an RM (part time), mobilized to the Site for loading out of rejected capacitors. OSC Tagliaferro and TAT member Strzempko also mobilized to the Site.

Approximately 32 pallets of rejected capacitors within corrugated cardboard boxes were moved from western portions of the building where they had been staged to the overhead garage door near the northeastern corner of the building. The pallets were moved with a forklift which OHM had rented for use at the Site. Additionally, four open-top steel drums of rejected capacitors were moved near the garage door for loading and disposal. The rejected capacitors were scheduled to be landfilled at the Modern Landfill, Inc. in Model City, NY (Waste Technology Services was the disposal broker).

Later in the morning, two 30 cubic yard dump trucks from the West Central Environmental Corp. (a subcontractor to Waste Technology Services) arrived on the Site, and were lined with polyethylene sheeting. Truck #1 was loaded with 15 pallets of waste capacitors,

and truck #2 was loaded with the remaining 17 pallets and four open-top 55-gallon drums of waste capacitors. The pallets as well as the boxes were placed into the trucks for ease in loading. The bill of lading for the shipment allowed for five percent of the load to include wood debris. After loading, the trucks departed for the disposal facility in Model City, NY. The empty 55-gallon drums were placed in the cage outside of the southeast corner of the building.

After loading the waste capacitors, OHM workers began work on cleaning out the zinc dust hopper located outside of southern portions of the Site building. Within the zinc dust hopper, 81 wire mesh tubes were hung vertically, and each tube was covered with a Goretex™ filter. Individual tube and filters measured approximately 15 feet in length, and each was removed from the zinc dust hopper through an access panel near the top of the hopper. Workers on the ground removed the filters from the tubes and placed them into steel open-top 55-gallon drums.

Removal of the tubes from the hopper began after polyethylene was laid down around the surrounding area. Any dust falling through the hopper was caught in a steel open-top 55-gallon drum placed beneath the opening on the bottom of the hopper.

Approximately eleven filters were removed from the hopper and taken off of the steel mesh tubes by the end of the day.

Three representatives from Laidlaw arrived at the Site to set up for labpack activities tomorrow. Laidlaw completed unloading of materials required for labpacking and departed from the Site for the day.

March 18, 1992

OHM workers arrived at the Site and resumed work on removing filters from the zinc dust hopper.

Laidlaw personnel arrived at the Site and consolidated lab containers into compatible groups for placement into labpack containers. Drums which were generated by Laidlaw as part of their labpacking procedure included: 15 steel 55-gallon open top drums; 10 plastic 5-gallon pails; 10 plastic 30-gallon open top drums; one plastic 50-gallon open top drum; and one steel 85-gallon overpack drum. Laidlaw scheduled a licensed transporter to pick the drums up on March 24, 1992 and demobilized from the Site.

OHM completed removal of the remaining 80 filters from the zinc dust hopper. The filters and residual dust from the hopper were placed into four steel 55-gallon open top drums and numbered 321 through 324. Wire mesh tubes from the hopper were placed in the

Site building, and the hopper was sealed with duct tape and polyethylene.

The fork lift was demobilized from the Site. OSC Tagliaferro and TAT member Strzempko demobilized from the Site.

March 19, 1994

OHM workers demobilized from the Site.

March 24, 1992

OSC Tagliaferro and RM Blodgett were on site to oversee the load out of labpack containers/drums by Laidlaw. Prior to loading onto Laidlaw's box truck, all labpack containers/drums were numbered. Manifests for the 37 total containers being taken by Laidlaw were signed, and Laidlaw departed from the Site.

OSC Tagliaferro checked the integrity of all remaining staged drums in the building, and noted that all were still intact.

The OSC and RM prepared a composite sample of DOP/IPBP (a composite sample of tanks # 1 through #8) for analyses by EWR (a disposal company who had bid on the disposal of the oil). Tanks #1 through #8 were combined into one waste stream because initial laboratory results indicated similar characteristics and PCB concentrations well below 50 ppm for each individual tank sample.

All personnel demobilized from the Site.

March 26, 1994

EPA issued a $250,000 delivery order to EPA Region I's new ERCS Contractor, Environmental Technology, Inc. (ETI). This was necessary because EPA's contract with OHM was scheduled to terminate on April 30, 1994.

March 27, 1994

The OSC received a revised data package for the compatibility analysis performed on the "unknown drums". The data was again insufficient, and the OSC directed OHM to resolve the problem.

April 6, 1994

Personnel from OHM sampled tank #9. The analytical data was received on April 17, and it indicated that the material in the tank did not contain PCBs, however, the material did contain RCRA regulated waste.

April 10, 1994

The OSC requested a revised warrant extending EPA's access to the Site property. The current warrant authorized access through this date. The request was made through Mark Lowe, EPA case attorney, and Cathy Baker, an attorney for the Environmental Enforcement Section of the Department of Justice. A judge magistrate signed the revised warrant extending authority for access through November 13, 1992.

April 15, 1994

EPA case attorney Mark Lowe informed the OSC that the "access extension" that the magistrate signed does not authorize EPA to perform soil excavation and that EPA will need to get another document signed by the Court.

The OSC received the revised compatibility data from OHM. The data indicated the presence of PCBs in the majority of the drums, however, the data quality appeared questionable. Therefore the OSC decided that he would direct ETI to recheck all the data.

April 20, 1992

EPA closed-out the delivery order with OHM and the OSC directed ETI take over the subcontracting of site services including security, portable toilets, dumpster, telephone and electricity. All of OHM's compatibility and disposal analysis was forwarded to ETI.

NOTE: Although OHM collected samples for disposal analysis for many of the tanks and drums present at the Site as early as January, OHM failed to arrange for the disposal of this material. This was primarily due to laboratory problems with the compatibility analysis (see above) and matrix interference with disposal analysis samples that made the accurate detection of PCBs difficult.

May 4, 1992

ETI mobilized an RM, PCT and a laborer to the Site. OSC Tagliaferro mobilized to the Site and provided a scope of work and orientation to contractor personnel. The contractors reviewed and signed the Site Safety Plan.

May 5, 1992

ETI personnel began modifying fittings on the bottom of tanks #1 through #6 to allow their contents to be pumped into a vacuum truck. The RM and PCT began obtaining subcontractor bids for copier/facsimile, analytical and disposal services.

A chemist, subcontracted by ETI, mobilized to the Site and arrived late at night.

May 6, 1992

The ETI RM briefed the chemist about site activities and had him sign the Safety Plan. A field hazardous categorization (haz-cat) kit was brought on site, and the chemist prepared to perform quality assurance/quality control (QA/QC) field screening on the compatibility results provided by OHM.

A copier and facsimile machine were delivered to the Site. The RM and PCT continued to obtain analytical and disposal service bids. Also, all drums were checked for leakage and samples from the DOPCW waste stream were bulked into 2 plastic five-gallon pails.

May 7, 1992

The OSC and ETI personnel arrived at the Site. The chemist initiated haz-cat procedures on samples which had previously been categorized by OHM's subcontracted lab, as a QA/QC check of past work.

The OSC and RM reviewed past PCB compatibility data performed by OHM. Based on the prevalence of PCBs at the Site, the OSC determined that any samples with PCBs greater than 5 ppm would be classified as a PCB waste. This conservative approach was taken to ensure that disposal facilities would not reject materials as TSCA regulated wastes if they were sampled and analysis indicated greater than 50 ppm PCBs.

The "unknown" drummed material on site was segregated into the following categories:

- PCB Oil/Solvents (which included the drums from the Paint Spray Booth Wash Water waste stream).
- PCB Decon Water (which included the drums in the following tentative waste streams: Washer Machine Water, Impregnator Machine Decon Water, Floor Decon Water, and Ring Pump Liquids).
- Non-PCB drums.

May 8, 1992

The OSC and ETI personnel arrived at the Site. The ETI chemist began performing QA checks on all drummed materials classified as non-PCB unknowns. The remaining crew began bulking PCB drum waste streams.

The OSC directed ETI to collect a composite soil sample from 4 previously screened soil locations: A009, A035, A045 and A046. The sample was sent to National Environmental Testing laboratories of

Thoroughfare, NJ, for TCLP analysis, pH, reactivity, ignitibility and PCBs.

ETI workers composited new samples of DOPCW for reanalysis of base/neutral acid extractable compounds (BNAs) and PCBs. Conflicting PCB data between past OHM subcontracted analysis and disposal facility analysis made this necessary.

May 11, 1992

The ETI chemist completed haz-cat procedures on all drum samples. All drums with PCB concentrations less than 5 ppm where tentatively placed in a Flammable Liquids waste stream. Liquids from 2 bi-layered drums (#s 147 and 248) of liquids/solids containing PCBs were pumped into drums classified in the PCB Oil/Solvents waste stream. Solids from drum #147 was placed into drum #248 and placed in the Oily Speedy Dry waste stream (a/k/a the PCB Solids/Sludges waste stream). ETI prepared a tentative list assigning each drum into a waste stream.

May 12, 1992

The OSC tentatively concurred with the RM to have all liquid waste streams disposed of via tankers, and all solid waste streams via drums. Therefore, all solids would be consolidated to minimize the total number of drums, and drums with liquids could remain partially full.

ETI restaged all drums into waste streams and segregated all samples into appropriate waste streams. The contents of Drum #s 151 and 224 were bulked into drum #144 (PCB Solids/Sludges waste stream). The liquid portion of drum #198 was bulked into drums in the PCB Oil/Solvents waste stream and the solids portion of the drum was bulked into drum #144 (PCB Solids/Sludges waste stream).

May 13, 1992

The OSC and ETI personnel arrived at the Site. ETI stated that drum #200 was a semi-solid unused virgin material. Compatibility testing was consistent with the MSDS on the product. The OSC decided to dispose of the drum as an off-specification virgin product.

Based on the compatibility results and visual inspection, the OSC classified the following drums as off-specification virgin product:

drum #s 155, 157, 158, 159, 160, 161, 164, 200, 220, 221, 222, and 223. These drums were staged closest to the northeast garage door of the Site.

Drum #164 was found to contain a corrosive liquid and was repackaged from a steel 85-gallon overpack into a plastic 85-gallon

overpack. Drum #223 was repackaged into a lined steel 55-gallon open-top drum.

The Vermont Electric Company notified the ETI RM that the transformers located on the property belonged to Jard. The OSC decided to sample oils from these transformers for PCB analyses. The electric company agreed to disable power to the Site and sample the transformers tomorrow.

ETI composited samples for the following waste streams: PCB Oil/Solvents; PCB Decon Water; Flammable Liquids; PPE; and PCB Solids/Sludges. During compositing procedures, no reactions or temperature changes were observed. ETI also began making new drum maps indicating the locations of all new waste streams.

The ETI RM sent out bid requests for disposal analysis for the following waste streams identified above and for PCB analysis of transformer oils. The RM also requested transportation bids for hauling materials to various disposal facilities.

The OSC and PCT performed an inventory of expendable equipment.

May 14, 1992

The RM sent out bid requests for disposal of off-specification virgin materials to AETC, Latham, NY; Clean Harbors, Inc., Kingston, MA; Pollution Solutions, Inc., Williston, VT; and Northeast Environmental Services (NES) of Wampsville, NY.

Detex keying stations were installed to ensure that security guards were checking various site areas both within and outside of the Site building.

Two RTs demobilized from the Site.

May 15, 1992

The PCT demobilized from the Site. The RM remained at the Site to coordinate T&D activities.

New England Telephone removed phone lines near exterior site areas south of the Site building to allow access to excavate PCB contaminated soils. Central Vermont Power arrived at the Site and sampled six pole mounted transformers south of the Site building. The poles and transformers were the property of Jard.

The RM packaged and shipped the transformer oil samples, as well as 5 waste stream samples to Analytikem, Inc., for disposal analyses. The RM continued to contact vendors for T&D services of wastes from the Site.

May 18, 1992

The RM arrived at the Site and contacted Dig-Safe to identify potential underground utilities prior to excavation of soils near southern portion of the Site. Dig-Safe issued permit #92210561. Synergy Gas was also contacted to identify any underground gas lines.

The RM received PCB and semi-volatile analyses results from the DOPCW waste stream which indicated PCBs at a concentration of 13 ppm.

May 19, 1992

The RM arrived at the Site and continued to plan for the T&D of wastes from the Site.

Synergy arrived at the Site and marked gas lines. The RM contacted vendors for disposal of the DOPCW waste stream. CTC of Bristol, CT and Heritage Environmental Services of Indianapolis, IN did not bid on disposal because of the PCB content. OSCO Treatment Systems, Inc. (OSCO) of Nashville, TN said they may be able to accept the waste for wastewater treatment. Franklin Environmental Services declined to bid on any transportation bids.

A representative of Environmental Products and Services (EPS) of Albany, NY arrived at the Site and was given a bid request package for the off-specification virgin chemicals.

May 20, 1992

The OSC and RM arrived at the Site and continued to coordinate T&D of site wastes. Bids were received from Clean Harbors, Inc., AETC, Pollution Solutions, NES, and EPS for disposal of the off-specification virgin material.

The low bidder for disposal of the off-specification virgin material, which was comprised of 8 separate waste streams, was EPS. They proposed to ship the material to Cycle Chem in Elizabeth, NJ for temporary storage. Cycle Chem proposed to transport the material to the following three ultimate disposal facilities: Systech Incinerator in Paulding, OH; Dupont Denemours in Deepwater, NJ; and Michigan Disposal, Inc. (MDI) in Belleville, MI. The OSC told the RM to proceed with T&D arrangements pending confirmation that the disposal facilities listed were in compliance with the CERCLA Off-Site Disposal Policy.

A waste profile was completed for the DOPCW for EWR. The OSC consented with the RM for the selection of East Coast Environmental for disposal of the products in tanks #1 through #6 and tank #9 to ESSROC in Logansport, IN, pending a compliance check to ensure the facility was not a violation the CERCLA Off-Site Disposal Policy.

The RM and OSC departed from the Site.

May 26, 1992

The ETI RM found two additional containers of unused off-specification virgin material in the Site building: a five gallon pail of dimethylaminoethanol and a 55-gallon drum of 2-chloro-anthraquinone. EPS agreed to accept the material and classified the material based on information contained in MSDS sheets. This increase the number of waste streams to be disposed of by EPS to 10 and the number of drums/containers to 14.

The OSC contacted Austine Frawley, a contact for the EPA Regional CERCLA Off-Site Disposal Policy and inquired about the compliance status for certain disposal facilities. Ms. Frawley's office stated that Dupont, MDI, and Systech were in compliance, and ESSROC was not in compliance with the CERCLA Off-Site Policy.

The OSC contacted the RM and informed him that drum shipment to Cycle Chem was in compliance and could proceed, and that the drum shipment to East Coast Environmental could not proceed. The RM began pursuing alternate disposal facilities for the material in tanks #1 through #6, and tank #9.

The OSC received analytical data from NET for the composite soil sample. The results indicated that the TCLP, pH and reactivity tests were all negative with respect to characterizing the soil as a RCRA regulated waste. The PCB concentration was 700 ppm which designated the soil as a TSCA regulated waste.

May 27, 1992

EPS sent the OSC 10 completed material profile sheets for the off-specification virgin material. The OSC signed and returned the material profile sheets.

The OSC contacted Stan Corneille, Vermont DEC and updated him on site activities. The OSC stated that the EPA proposed a cleanup level of 25 ppm for PCBs in soil. Mr. Corneille agreed to let the OSC know whether or nor the Vermont DEC would concur with this cleanup level.

May 28, 1992

The RM was on site and contacted OSC Tagliaferro. He stated that EPS would be on site June 3, 1992 to pick up the off-specification virgin material.

The RM placed sample jars containing excess off-specification sample material into their respective drums and moved the drums to the loading dock located at the northwestern portion of the Site building.

The OSC directed ETI to solicit bids for the disposal of the contaminated soil.

May 29, 1992

The RM demobilized from the Site for another EPA Region I removal site.

June 1, 1992

The RM contacted the OSC and stated that he had received bids from NES, for disposal of tank wastes at River Cement, in Festus, MO and at Medusa Cement in Wampum, PA. Norlite of Cohoes, NY submitted a bid for disposal of the tank waste but their corporate policy is not to accept wastes with PCB concentrations greater than 25 ppm. USPCI of Philadelphia, PA was also contacted for a disposal bid of the tank waste. EWR, which initially detected PCBs > 50 ppm in the composite sample of the tank waste sent to them, agreed to reanalyze the sample.

The RM sent composite soil sample data to CWM Chemical Services, Inc. (CWM) and Envirosafe for disposal quotes for the PCB Contaminated Soil and Debris waste stream. The RM also said he would contact GSX in Pinewood, SC for a disposal quote for this waste stream.

June 3, 1992

The OSC arrived at the Site and observed the loading of, and signed manifest documents for, the disposal of 14 drums of off-specification virgin material to Cycle Chem (brokered through EPS).

The OSC contacted Austine Frawley and inquired about the compliance status for additional disposal facilities. Ms. Frawley's office stated that Medusa Cement and USPCI were in compliance with the CERCLA Off-Site Policy. Region VII contacts would verify if River Cement was in compliance at a later date.

The OSC demobilized from the Site.

June 8, 1992

The RM contacted the OSC and stated that EWR had analyzed the composite sample for tanks #1 through #6 and tank #9, and detected PCBs at levels greater than 50 ppm. Since the EWR data was inconsistent with all previous data for the tanks, the OSC and RM agreed to send an additional tank composite sample to AnalytiKEM for one week turn around for analysis of PCBs.

June 9, 1992

The RM contacted the OSC and stated that OSCO had approved the DOPCW waste stream and were sending profile data to him. The OSC stated that he was still awaiting confirmation of compliance from region IV contacts. To facilitate final acceptance at the facility pending compliance approval, the OSC sent a letter to OSCO stating that according to analytical data and EPA policy, the waste was not TSCA regulated.

June 11, 1992

Austin Frawley informed the OSC that the River Cement Facility was in compliance with CERCLA Off-Site Policy.

The OSC signed a waste profile for OSCO, and sent it to the RM.

The delivery order ceiling for ETI was increased from $550,000 to $800,000.

June 16, 1992

The RM contacted the OSC and stated that he had received results of the PCB analyses on the tank waste composite sample from Analytikem which was previously sent to EWR (tanks #1 through #6 and tank #9). Results of the analyses indicated 19 ppm PCBs, which was consistent with previous EPA sampling results that detected between 0 ppm and 29 ppm PCBs.

The results indicated that the material could be disposed of as non-TSCA regulated waste.

June 17, 1992

Edmund Burke, EPA Region IV CERCLA Off-Site Compliance Policy contact informed to the OSC that OSCO was currently in compliance.

The RM sent the OSC a bid sheet and attached bids for the disposal of DOPCW; and the disposal of the material in tanks #1 through #6 and tank #9. Low bids were received from OSCO (for the DOPCW) and NES (for the tank waste).

June 19, 1992

The RM received bids for transportation of the DOPCW to OSCO (in Nashville, TN) from Freehold Cartage, Inc. (FCI) of Freehold, NJ; Sealand of Derby, CT; and Frank's Trucking of Niagara falls, NY. FCI was the low bidder. The RM scheduled a tentative shipment date for June 24, 1992.

June 21, 1992

The RM mobilized to the Site to continue with T&D coordination.

June 24, 1992

The OSC mobilized to the Site. The contents from 124 drums of DOPCW were pumped into two tankers for transport to OSCO, in Nashville, TN. The first tanker contained an estimated 3,410 gallons of waste and the second tanker an estimated 3,425 gallons of waste.

Written bids from CWM were received for the T&D of the PCB Contaminated Soil and Debris waste stream. The RM was still awaiting PCB soil related transportation bids from Envirosafe and GSX. Based on the information received to date, CWM in Model City, NY appeared to be the low bidder. The OSC decided to complete the waste profile and send it along with a sample to CWM for approval.

Bids were received from Envirosafe, APTUS, and Rollins for disposal of the PCB contaminated water in storage tank #10 (the underground concrete tank located south of the Site building). Since the bids were in the range of $37,000 for the T&D of the material, the OSC directed the RM to investigate on-site treatment options.

The RM and OSC received disposal analysis from AnalytiKEM on the following tentative waste streams:

- PCB Decon Water
- PCB Oily Speedy Dry (a/k/a PCB Solids/Sludges)
- PCB Oil/Solvents
- Flammable Liquids
- PPE

The OSC and RM agreed to combine the PCB Oil/Solvents and Flammable Liquids waste streams since both composite samples of these materials had PCBs detected in them at 23 ppm and 24 ppm PCBs, respectively. Previous screening of individual samples in the PCB Oil/Solvents waste stream had detected levels of PCBs greater than 50 ppm. Therefore, in order to avoid dilution of TSCA wastes, and to be conservative, the OSC elected to combine the two waste streams and dispose of them as TSCA/RCRA regulated waste. The new waste stream was labelled PCB Oil/Solvents.

The OSC and RM also agreed to combine the PCB Solids/Sludges drums and the two drums from the crush operation into one waste stream since both were TSCA/RCRA regulated wastes with similar characteristics. This "new" waste stream was labelled PCB Solids/Sludges.

Based on the analytical results, the OSC determined PCB Decon Water to be a TSCA/RCRA regulated waste (PCBs and trichloroethylene).

Since there were only two permitted commercial facilities in the United States which would accept TSCA/RCRA regulated waste (APTUS in Aragonite, UT and Rollins in Deer Park, TX), the OSC decided to profile the three TSCA/RCRA regulated waste streams from the Site directly to these facilities, as well as a disposal broker.

The OSC also received the analytical results for the oil in the transformers. Since the results indicated PCB concentrations less than 50 ppm, the OSC determined the transformers did not have to be removed from the Site under the removal action.

The OSC demobilized from the Site. The RM remained at the Site to continue with T&D coordination.

June 30, 1992

The RM informed the OSC that NES's River Cement disposal facility detected PCBs in the sample from tanks #1 through #6 and tank #9 at 41 ppm. NES sent the sample to a private laboratory who detected PCBs at 51 ppm, conflicting with previous EPA data from Analytikem, who had detected PCBs at 19 ppm. It was later determined that the private laboratory used by NES had included a preparatory sulfur cleanup step to reduce interference during sample analyses. This "cleanup step" is not required by Method SW 8080, which is the standard analytical method for PCBs.

NOTE: On several occasions in June, the on site security guards found people in the building. In one instance a man was found sleeping in the drum staging area and the other times teenagers were found trespassing in other areas of the building. The security company was reprimanded for failure to prevent access to the building. However, these instances reenforced the necessity to maintain manned security 24 hours per day.

July 2, 1992

The RM demobilized from the Site for another Region I EPA removal site.

July 4, 1992

The RM returned to the Site to continue preparations for the T&D of on site waste.

July 6, 1992

The RM contacted the OSC and stated that Analytikem had reanalyzed the sample from tanks #1 through #6 and tank #9, utilizing the preparatory sulfur cleanup step used by NES's private lab. The results indicated 42 ppm PCBs in the composite sample. Based on the previous results of individual tank samples, the OSC and RM decided to send NES individual samples for tanks #1, #6, and #9.

Corresponding past results of these tanks were 9 ppm, non-detection and non-detection, respectively. The OSC decided that a decision on the disposal of tanks #1, #6, and #9 would be based on the NES results. The OSC further determined that tanks #2, #3, and #4 would be disposed of as TSCA regulated waste.

Since at least tanks #2, #3, and #4 would have to be disposed of as TSCA regulated waste, waste profiles and composite samples from tanks #1 through #6 and tank #9 were subsequently signed and sent to APTUS and Rollins for bids on T&D. NOTE: Tanks #1, #6, and #9 were included in the waste profiles pending the individual PCB results from NES.

July 7, 1992

The facsimile machine and copier were demobilized from the Site. The RM demobilized from the Site since all waste profiles had been sent out and bids were requested for the T&D for all waste streams.

July 8, 1992

The OSC spoke with Stan Zaulstowski, EPA Region VIII CERCLA Off-Site Contact. He stated that APTUS was currently in compliance with the CERCLA Off-Site Policy, and they were able to accept TSCA/RCRA regulated wastes.

July 13, 1992

Mark Lowe, EPA case attorney, contacted the OSC and informed him that after further review of the administrative warrant for the Site, a separate warrant was not necessary to perform soil excavation.

July 27, 1992

The OSC spoke with the RM. ETI selected CWM as the low bidder for the T&D of the PCB Contaminated Soil and Debris waste stream. Also, the RM informed the OSC that the PCB results were received from NES for tanks #1, #6, and #9. The results were:

- Tank #1: 28 ppm PCBs.
- Tank #6: 12 ppm PCBs.
- Tank #9: 47 ppm PCBs.

NOTE: Eventually, NES determined that they would accept tanks #1 and #6 as non-TSCA regulated waste. Tank #9 was placed in the waste stream with tanks #2, #3, and #4, all of which the OSC determined were TSCA regulated waste.

August 19, 1992

Representatives from TRC, a contractor performing work for the EPA Pre-Remedial Section, were on site to collect soil and monitoring well samples.

August 20, 1992

Todd Perkins, a representative from TRC contacted the OSC and stated that the sample collected from monitoring well MW-3 had three layers: a thin oil layer on top, a water layer, and a bottom oil layer. At the direction of Don Smith, EPA Pre-Remedial Section, Mr. Perkins requested that the OSC arrange analyses of the sample at EPA NERL.

August 24, 1992

The OSC arranged for EPA NERL to perform analyses of the sample collected from monitoring well MW-3 by TRC. A representative from TRC dropped the sample off at EPA NERL.

September 3, 1992

Mick Goldsmith, Bennington Rural Fire Department, contacted the OSC and stated that he had received a call from the Site security guard about unusual odors in the Site building. The Bennington Fire Department (BFD) responded to the Site and checked the staged drums in the building. They found no indications of hot or leaking drums. The BFD did notice an odor, but attributed it to the hot and humid weather.

September 15, 1992

The OSC received bids from Rollins for the T&D of the PCB waste streams and the material in tanks #1 through #6 and tank #9. The RM contacted the OSC and stated that he was encountering difficulties in getting approvals from East Coast (the disposal broker) and APTUS for disposal of TSCA/RCRA regulated wastes in a reasonable time frame.

Based on these difficulties and the severely limited number of facilities accepting TSCA/RCRA regulated wastes, the RM suggested a sole source justification for the use of Rollins. The OSC requested that the RM complete subcontractor consent forms for such a sole source transaction, and submit them to the OSC.

The OSC also requested that the RM complete and send subcontractor consent forms and written bids for the following waste streams:

- PCB Contaminated Soil and Debris
- PCB Decon Water
- PCB Solids/Sludges

- PCB Oil/Solvents
- Non-TSCA Regulated Tank Taste (tanks #1 and tank #6)
- TSCA Regulated Tank Waste (tanks #2, #3, #4 and #9)
- Empty Drums

September 16, 1992

The OSC spoke with Ron Shannon, EPA Region VI CERCLA Off-Site Policy Contact, who stated that the Rollins disposal facility in Deer Park, TX was currently in compliance with CERCLA Off-Site Policy.

The OSC spoke with Region I TSCA contact Tony Palermo regarding out of service dates for transformers, capacitors, empty drums, or soil contaminated with PCBs at Superfund sites. Mr. Palermo stated that it was reasonable to make the shipping date the out of service date.

September 17 through October 7, 1992

ETI continued to coordinate the T&D of all remaining waste streams.

- NES approved the contents of tanks #1 and #6 for acceptance into their facility as non-TSCA regulated waste. ETI awarded NES the subcontract for this waste stream.

- The OSC placed the contents of tank #9 into the TSCA Regulated Tank Waste waste stream (with tanks #2, #3 and #4). The OSC determined that the 47 ppm PCBs in tank #9 was too close to the TSCA limit of 50 ppm PCBs for the tank waste to be considered non-TSCA regulated.

- ETI determined Rollins was the only responsive bidder for the PCB contaminated drum and tank waste.

- The OSC determined that the water in the tank #10 (the underground concrete vault) would not be removed as part of this removal action. The OSC made this determination because of the following:

  1. The bottom of the vault is in the groundwater table.
  2. Due to the age and the fact that the vault is made of concrete, there is a high probability that the contents of the vault (primarily water) is hydraulically connected to the groundwater.
  3. The results from the monitoring well samples collected by TRC as part of the Pre-Remedial PA/SI identified the presence of an oil layer in the groundwater from Monitoring Well #3. The analytical results of the oil layer identified the presence of **150,000 ppm or 15% PCBs and 640,000 ppm or 64% DOP oil.**

4. The concentration of PCBs in the water in the vault was 140 ppm and the concentration of DOP oil in the vault was non-detect.
5. Since the levels of PCBs in the oil layer of the **groundwater** were 1,000 times greater than that in the vault, the OSC determined that pumping out the vault would not benefit the environment. Furthermore, contaminated groundwater would most likely re-infiltrate the vault.

October 8, 1992

ETI mobilized a new RM to the Site. Also, OSC Tagliaferro, OSC Carol Tucker and TAT member Strzempko mobilized to the Site. An orientation of site activities was held for the upcoming removal schedule. OSC Tucker would be on site to take the place of OSC Tagliaferro during October's removal activities.

OSC Tagliaferro decided to send all empty drums from the Site to Cardinal Compliance for disposal.

OSC Tagliaferro and OSC Tucker discussed the extent of the soil excavation to be performed at the Site. Previous discussions between OSC Tagliaferro and Stan Corneille, Vermont DEC, had indicated that 25 ppm was an acceptable cleanup level for a fenced industrial facility such as Jard.

Results of recent EPA pre-remedial sampling of groundwater from monitoring well MW-3 indicated approximately 15 percent of PCB Aroclor 1242 in the bottom organic layer. Such a result indicated that the groundwater was highly contaminated at the Site.

Both OSC Tagliaferro and OSC Tucker felt that because of the significant groundwater contamination, the Site would require further action that is beyond the authority of the Removal Program. Therefore, the OSCs decided to mitigate the direct contact threat posed by PCBs in Sample Areas 1, 2, and 3. The OSCs further determined that since the groundwater was heavily contaminated with PCBs, excavating soil until all PCBs were removed was impractical. Furthermore, the heavily contaminated groundwater would most likely re-contaminate the soil.

The OSCs proposed to Stan Corneille of the Vermont DEC and to their supervisor, David McIntyre, to excavate the top two feet of PCB contaminated soil and backfill. The lateral extent of contamination would be determined by an action level of 25 ppm PCBs. Both Stan Corneille of the Vermont DEC and David McIntyre of EPA concurred with this approach.

October 9, 1992

The RM, OSCs, and TAT member Strzempko arrived at the Site and continued additional planning and preparation for the T&D phase of the removal action.

October 12, 1992

OSC Tucker arrived on site and assumed the role as lead OSC for EPA. ETI mobilized a crew to the Site. Copies of the Site Safety Plan were reviewed and signed.

A safety meeting was held and the crew began preparing tanks and segregating drums scheduled to be pumped off into tanker trucks tomorrow. The RM worked on securing an excavator and loader for PCB contaminated soil excavation activities.

October 13, 1992

ETI requested EPA consent to a sole source subcontract with Rollins for the PCB waste streams. However, Rollins refused to concur with some of the FAR clauses in the subcontract. The EPA OSC contacted the EPA Contracting Officer (CO) and explained that Rollins was the only bidder on the PCB tank and drum waste and requested that the CO determine if it was acceptable to allow ETI to ship waste to Rollins. The EPA CO stated ETI could use Rollins for the shipments scheduled for today, and that the CO would continue to investigate the issue.

Custom Environmental transport (CET), a bulk hazardous liquid hauler subcontracted by Rollins, arrived with two trucks for loading and transport of drum and tank materials from the Site. The contents of tanks #2, #3, #4 and #9 were vacuumed out into the first tank truck through a hole in the Site building's southern wall. The contents of drums #290 (which contained the contents of tank #8) and #310 (which contained the contents of tank #7) also were vacuumed into the first CET truck. The first tank truck contained an estimated 2,800 gallons of waste.

A second CET truck vacuumed the contents out the 54 drums in the PCB Oil\Solvents waste stream. The second tank truck contained approximately 2,000 gallons of waste. Both trucks departed the Site.

The tanker scheduled by NES to dispose of the waste in tanks #1 and #6 was cancelled due to the temporary shut-down of NES's disposal facility.

At the end of the day, John Mirisola, a member of EPA's ESAT contractor, arrived at the Site to prepare PCB field screening instrumentation consisting of an AID ECD gas chromatograph. PCB field screening was required to complete the extent of

contamination sampling initiated in February 1992 and to analyze soil that would remain at a depth of two feet.

October 14, 1992

TAT member Strzempko began collecting additional soil samples from Sample Area 1 for PCB screening by ESAT. The purpose of this sampling was to complete the lateral extent of contamination survey. The sampling results are included in Table 1 (see page 30).

ETI began repackaging the waste in the 12 PCB Solids\Sludges waste stream into drums of less than 300 lbs each. This was a requirement of Rollins.

An excavator and front-end loader were mobilized to the Site. ETI began excavating soils from Sample Area 3 (east side of Site building. The excavated material was placed on polyethylene sheeting which had been laid out east of the Site building next to the empty drum storage shed.

While excavating Sample Area 3, a gas line was encountered at one foot in depth, approximately two feet from the edge of the pavement (which was the eastern limit of excavation in this area). When contacted, both OSC Tagliaferro and Synergy Gas Co. stated that the lines had been purged and were empty. Excavation proceeded with caution in this area. The gas line was not removed.

The RM informed the OSC that NES would not be able to ship the bulk load of DOP oil from tanks #1 and #6 until at least late October.

October 15, 1992

ETI's crew completed excavating soils in Sample Area 3. The excavated soil contained a large number of rocks, and the OSC decided that any rocks greater than one foot in diameter would be placed back into the bottom of the excavation. See Figure 7 - Soil Excavation Diagrams, for a delineation of excavated areas.

TAT collected five soil samples from the bottom of the Sample Area 3 excavation for field screening by ESAT. The samples were collected to document remaining soil conditions at two feet in depth. Table 3 - Post-Excavation PCB Field Sampling Results, presents the results for these samples. The sample locations are shown on Figure 7.

Upon completion of soil excavation from Sample Area 3, the crew began excavation from Sample Area 2. During excavation of soils from central portions of Sample Area 2, a circular piece of concrete measuring four feet in diameter was encountered at approximately 2 feet in depth. The object was later discovered to be the cover to a drywell. One side was cracked during excavation,

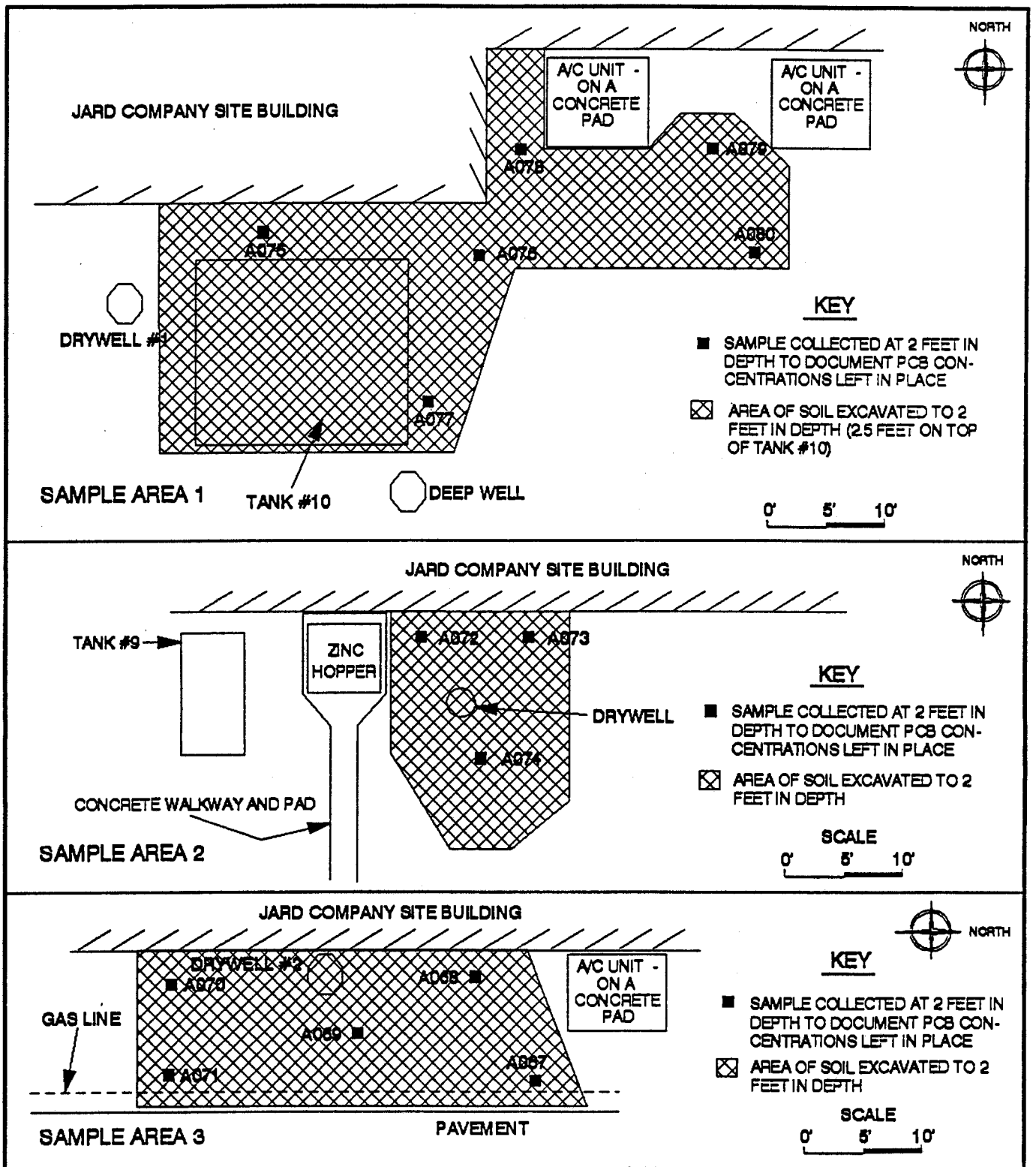


FIGURE 7
SOIL EXCAVATION DIAGRAMS
JARD COMPANY SITE
BENNINGTON, VERMONT

WESTON®
MANAGERS DESIGNERS/CONSULTANTS
REGION I TECHNICAL ASSISTANCE TEAM

DRAWN	DATE	PCS #
DES	12/94	1114AAF7.DRW
APPROVED	DATE	TDD #
	12/94	01-9412-12

TABLE 3
POST–EXCAVATION PCB FIELD SAMPLING RESULTS

JARD COMPANY SITE
BENNINGTON, VERMONT
OCTOBER 15–19, 1992

SAMPLE STATION	GRID LOCATION	PCB RESULT (ug/gm)
A067	AREA #3	93F
A068	AREA #3	35F
A069	AREA #3	140F
A070	AREA #3	31F
A071	AREA #3	7F
A072	AREA #2	380F (AV.)
A073	AREA #2	23F
A074	AREA #2	220F
A075	AREA #1	10UF (AV.)
A076	AREA #1	>43,000F
A077	AREA #1	81F
A078	AREA #1	4990F
A079	AREA #1	1UF
A080	AREA #1	1UF

F – Data has been generated using a field screening method. Analytes are tentatively identified and concentrations are quantitative estimates.

U – The material was analyzed for but was not detected. The associated numerical value is the field screening quantitation limit.

(AV.) – Average value of two separate analyses.

but since the inside of the drywell was below the limits of excavation, it was backfilled. By the end of the day Sample Area 2 had been fully excavated.

TAT collected three soil samples from the bottom of the Sample Area 2 excavation for field screening by ESAT. The samples were collected to document remaining soil conditions at two feet in depth. See Table 3 for the sampling results and Figure 7 for the sampling locations.

Excavated soils were transported from Sample Area 2 to the staging area utilizing the front end loader.

Since excavation of soils from Sample Area 1 would require the excavator to be working around and underneath power lines and poles, the RM inquired if the local electricity provider could temporarily shut power off to the Site. Richard Wood, from Vermont Power, stopped at the Site, and informed the RM that power could be turned off between 0830 hrs and 1530 hours with one day prior notice. The RM requested that power be shut off tomorrow.

OSC Tagliaferro officially consented to the subcontract package for NES for the T&D of the waste in tanks #1 and #6.

October 16, 1992

Vermont Power personnel arrived at the Site and shut off the power. The ETI crew began excavating soils from Sample Area 1. The OSC decided to excavate an extra half foot in depth to the top of the concrete underground storage tank #10 (which was at two and one half feet in depth). By the end of the day, half of Sample Area 1 had been excavated. Power was restored to the Site.

The RM informed the OSC that due to a scheduling conflict, the drums of PCB Decon Water, which were scheduled to be vacuumed out and sent off site today, would instead be handled on Monday, October 19, 1992.

October 19, 1992

A tanker truck from CET arrived on site for loading and transport of the drummed PCB Decon Water waste stream. The contents of 39 drums were vacuumed into the truck for a total of approximately 2,000 gallons.

ETI completed the excavation of soil from Sample Area 1. ETI received seven loads of clean fill and began backfilling the excavated areas.

TAT collected six soil samples from the bottom of the Sample Area 1 excavation for field screening by ESAT. The samples were collected to document remaining soil conditions at two feet in

depth. See Table 3 for the sampling results and Figure 7 for the sampling locations.

Three of the fourteen post-excavation soil samples analyzed for PCBs by the field screening instrument were also submitted to EPA's New England Regional Laboratory for confirmation analysis. Table 4 - Laboratory Confirmation Results Summary for Samples Collected in October 1992, presents the quantitative off-site laboratory results and compares them to the field screening values for these three samples.

ETI continued to repackage the drums in the PCB Solids/Sludges waste stream. Portable scales were rented by ETI and delivered to the Site. The scales were to ensure weights of 300 pounds or less for the PCB Solids/Sludge drums.

The RM informed the OSC that CWM would be on site on October 21, for PCB soil load out, transport and disposal. The RM estimated that ten trucks would be needed due to the density of the soil being shipped.

Power was restored to the Site, and all personnel departed from the Site for the evening.

October 20, 1992

Three truckloads of clean fill were delivered to the Site and ETI completed backfilling operations.

A truck from Cardinal Compliance of Baltimore, MD arrived on site to pick up empty drums. The foreman and operator began loading the truck. Several drums appeared to have contents in the bottom, and these were segregated for inspection. It was later found that some of these drums contained sludges, which were solidified into two additional drums. The contents of these drums placed into the PCB Solids/Sludges waste stream. Two hundred and seventy-six 55-gallon empty steel drums and three 5-gallon empty steel pails were transported to Cardinal Compliance for disposal.

Not all empties were able to be loaded on the truck, and the RM scheduled another empty drum load out with Cardinal Compliance for October 26, 1992. Approximately 80 55-gallon steel drums and 100 pails of 5-gallons or less in size remained to be disposed of from the Site.

ETI's crew continued to repackage the contents of the PCB Solids/Sludges drums into drums of 300 pounds or less.

TABLE 4
LABORATORY CONFIRMATION RESULTS SUMMARY
FOR SAMPLES COLLECTED IN OCTOBER 1992

JARD COMPANY SITE
BENNINGTON, VERMONT

Sample Station	Laboratory Results PCB (ug/gm)	Field Screening Results PCB (ug/gm)
A069'	23,000	140F
A074'	240	220F
A076'	33,000	>43,000F
A076dup'	8,100	----

' – Confirmatory analytical results performed at EPA New England Regional Laboratory in Lexington, MA.

F – Data has been generated using a field screening method. Analytes are tentatively identified and concentrations are quantitative estimates.

U – The material was analyzed for but was not detected. The associated numerical value is the field screening quantitation limit.

PCB Aroclors 1016, 1221, 1232, 1242, 1248, 1254, 1260, and 1262 were analyzed for in both methods, but only Aroclor 1242 was detected.

ETI began bulking/combining the contents the of following into the PCB contaminated soil pile:

- The drums in the Goretex™ Filters waste stream
- The drums in the Zinc and Dirt waste stream
- All of the PPE generated during the removal action
- The PCB contaminated vacuum cleaners, and
- A previously undiscovered basket of capacitors

October 21, 1992

The stockpile of PCB contaminated soil, the Goretex™ filters, zinc and dirt, PPE, etc. were loaded into ten dump trucks and transported to CWM in Model City, NY for landfilling. Truck scales at CWM indicated that a total of 197.41 tons of waste were removed from the Site and transported to Model City, NY for disposal.

October 22, 1992

ETI completed the repackaging of PCB Solids/Sludges drums into 26 drums of 300 pounds or less.

The ETI crew verified that the remaining drums were in fact empty. The drums were stacked for load out on October 26, 1992.

The excavator and loader were decontaminated.

ETI began preparations for final demobilization.

October 23, 1992

The OSC contacted Stan Corneille of Vermont DEC and informed him of on going Site activities.

The excavator and loader were demobilized from the Site.

ETI continued with additional demobilization activities.

The RM informed the OSC that NES would not be able to remove the waste from tanks #1 and #6 for several weeks. The OSC decided that if this was the only waste remaining at the Site, that security could be demobilized because the tanks were in relatively stable condition. The OSC informed Stan Corneille, Vermont DEC, of this decision.

October 26, 1992

The twenty-six drums of PCB Solids/Sludges waste stream were loaded and transported to Rollins in Deer Park, TX.

October 27, 1992

The remaining empty 55-gallon drums and containers were loaded out and transported to Cardinal Compliance in Baltimore.

ETI inventoried and loaded all remaining equipment/expendables into vehicles for demobilization. The portable toilet and water cooler were demobilized from the Site.

The OSC notified local officials that EPA would be demobilizing from the Site on Wednesday, October 28. The OSC informed the local officials that waste was still present in tanks #1 and #6.

The OSC demobilized from the Site.

October 28, 1992

Two members of the ETI crew demobilized from the Site. The copier, facsimile machine and trash dumpster were demobilized from the Site. Telephone and water service were disconnected, and security service was discontinued at 0800 hours.

October 29, 1992

The office trailers were demobilized from the Site.

The ETI RM demobilized from The Site.

November 11, 1992

The RM and an RT from ETI and OSC Tucker were on site for the disposal of liquids from tanks #1 and #6. A vacuum truck from NES arrived at the Site and pumped approximately 1,875 gallons of liquids from the tanks and departed.

Electricity service was disconnected from the building.

The OSC informed the police that the Site activities associated with the removal action were complete.

All crew and equipment demobilized from the Site.

2.11 Treatment, Disposal and Alternative Technology Options and Selections

A variety of disposal methods were utilized on materials taken from the Site. These included: wastewater treatment; fuel blending; incineration; landfilling; and recycling (zinc and empty drums). In addition, sealed drums were transported back to their manufactures for reuse and/or disposal. All material was disposed of at facilities in compliance with the CERCLA Off-Site Policy.

2.12 Community Relations

Following the initial site investigations and the request for assistance from the Vermont DEC, the local community welcomed the initiation of the removal activities by the EPA. The surrounding residential community was confronted with a fire and health threat posed by the hazardous substances present at the Site. The threats were effectively mitigated by the EPA removal action.

The OSC notified the Bennington Fire Department, Police Department and the local hospital at the inception of removal activities. The OSC updated the Fire Department periodically throughout the removal action. Furthermore, the OSC provided 10 POLREPs to local officials to maintain a free flow of information. In addition, the OSC responded to requests for interviews from local press.

A copy of the Administrative Record File was located at the Bennington Town Offices, Bennington, Vermont, and at the EPA New England Regional Laboratory, 60 Westview Street, Lexington, Massachusetts.

3.0 EFFECTIVENESS OF REMOVAL

3.1 Responsible Parties

The responsible party identified prior to the initiation of removal activities was the court-appointed trustee, Mr. Lawrence Levy, who initially indicated a willingness to perform the required activities (see Section 2.5). Mr. Levy arranged for the installation of a fence around the property, and also hired a company to move drums into the building. However, after receiving a draft unilateral order, Mr. Levy resigned. The property was effectively abandoned with Mr. Levy's resignation.

3.2 State and Local Agencies

The Town of Bennington assisted in the removal action by designating Troy Joseph, Fire Department Chief, as the primary local contact. The Bennington Fire Department agreed to provide support in the event of a fire. Other local officials such as Mick Goldsmith, the town's Hazardous Waste Coordinator, provided helpful information.

The Vermont DEC requested EPA's assistance at the Site because the DEC lacked the funding to conduct the removal action. The Vermont DEC designated Stan Corneille as the primary contact. Several site visits were made by Vermont DEC personnel and close contact was maintained with the EPA OSC. This resulted in a close coordination between the two agencies and expedited the removal action. The Vermont DEC also waived the state tax for transporters of hazardous waste.

3.3 Federal Agencies

The EPA promptly responded to the request for assistance from the Vermont DEC and conducted a Removal Site Evaluation in March of 1991. An Action Memorandum was signed in August of 1991. The removal of drums and hazardous materials within the building was completed in November of 1992 and eliminated the threat to human health and the environment posed by the contents of the bulk containers. In October of 1992, the top two feet of soil with PCBs greater than 25 ppm was excavated from the Site and removed, effectively mitigating any direct contact health threat at the Site.

The EPA OSC employed the most cost effective removal methods available for the particular situation while minimizing the potential exposure of hazardous substances to nearby residents. Air monitoring conducted during site activities documented that no measurable VOCs were detected off site.

3.4 Contractors and Private Groups

Weston TAT provided the OSC with a Site Safety Plan, monitored the ERCS contractor to ensure proper removal procedures were used, and assisted the OSC with site documentation. TAT's performance was competent and professional throughout the removal action.

OHM was the initial cleanup contractor for EPA. The field portion of their work was acceptable, however, OHM's performance in subcontracting laboratory services and in T&D coordination was generally poor.

ETI was the second cleanup contractor for EPA. ETI's performance was acceptable, however, ETI's subcontracting documentation was below average and required extensive revisions.

4.0 DIFFICULTIES ENCOUNTERED

Significant problems were encountered with the excavation of soils in late January, 1992. This was due to the presence of a deep frost. Thus, these activities were rescheduled until October of 1992.

Added administrative costs were incurred during the ERCS contract transition from OHM to ETI. By changing contractors midway through the removal action, ETI, the new contractor, required time to familiarize and adapt to OHM's removal scheme.

The presence of RCRA/TSCA regulated waste at the Site, and the limited number of commercial facilities in compliance with the EPA's CERCLA Off-Site Policy, added time and cost to the project.

The matrix interferences in many of the waste streams led to contradictory results for PCB concentrations. This problem was resolved by directing labs to perform an additional step in their analytical procedure (sulfur cleanup) and by the OSC conservatively classifying material as TSCA regulated if the results were close to the 50 ppm limit.

The requirement by EPA that the prime contractor (ETI) flow down controversial subcontract clauses to disposal facilities resulted in significant problems. Rollins, the only disposal facility who bid on the RCRA/TSCA regulated waste, refused to sign the subcontract with ETI because of the limitation of future contracting clause. The CO then had to allow ETI to send waste to Rollins without EPA consenting to the subcontract. (NOTE: Since there were no other bidders, EPA did not have the option of prohibiting ETI from subcontracting with Rollins.)

5.0 RECOMMENDATIONS

5.1 Prevention of Similar Release

The release of hazardous substances resulted from the improper storage and disposal of materials at the facility. Water and air treatment systems could have been implemented earlier in the life of the facility, to reduce PCB discharges from the facility (which eventually migrated into surrounding soil and groundwater).

Proper enforcement of current environmental regulations should minimize similar releases.

Given the nature of the regional economy and number of facilities which have been generators of hazardous waste and have gone out of business, a cleanup insurance or bond participation should be required of these facilities owners. If bankruptcy is declared by a company, a mechanism for funding cleanup activities would exist through such a requirement (much as is currently required in Vermont for petroleum product distributors under the yearly Petroleum Insurance Fund fee).

5.2 Improvement of Response Actions

EPA should revise current regulations or procedures to encourage more commercial disposal facilities to accept combined RCRA/TSCA regulated waste.

In the event that matrix interferences are expected in samples, EPA and contractors should require laboratories perform a "sulfur cleanup" as part of their analytical procedure.

EPA contracting personnel should re-evaluate the cost/benefit of requiring prime contractors to "flow down" all subcontract clauses to potential disposal facilities.

5.3 Contingency Plans

No changes are recommended to the National or Regional Contingency Plans.

6.0 SITE FILE INDEX

1.2 Pre-remedial Preliminary Assessment

1.3 Preliminary Assessment/Site Investigation--Removal Program

2.1 Correspondence
- Notes/Directions/Phone Numbers
- Removal Related
- Vermont DEC Files

2.2 Removal Response Reports
- ATSDR Health Assessment and Request
- Draft Environmental Assessment of the Jard Company Property, by Wehran Engineering for the Jard Company trustee, dated November 1989 (Phase I Report)
- Phase II Site Assessment, by Wehran Engineering for the Jard Company trustee, dated February 1991
- Report to the Bennington Fire Department
- Site Safety Plan

2.3 Sampling and Analysis Data
- Capacitor Sampling Data & Waste Profiles
- Disposal Analysis & Waste Profiles, DOPCW Waste Stream
- Drum Compatibility Data
- Drum Disposal Analyses, OHM
- Drum Tracking Reports
- Laboratory Packaging Inventory List & Waste Profiles
- PCB Drum Disposal Analysis & Waste Profiles, ETI
- Soil Sampling Data & Waste Profiles (1/92 - 5/92)
- Soil Sampling Results, October 1992
- Tank and Vault Sampling Data & Waste Profiles
- Waste Profiles & MSDS sheets for off-spec., unused products
- Well Sampling Results for Pre-remedial
- Wipe Sampling Results

2.4 POLREPs

2.5 OSC Report

2.6 Work Plans and Progress Reports
- OHM Work Plans
- PRP Monitoring by TAT

2.7 Cost Reports and Invoices
- OHM Invoices
- ETI Invoices

2.9 Action Memorandum

2.11 ARARs---State

2.12 Site Logs
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- Drum Logs
- Expendable/Equipment Entry/Exit Log
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- OSC Logbook
- Personnel Entry/Exit Log
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- Security Logs
- Site Log Book, TAT
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2.13 Daily Work Reports
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2.14 Daily Financial Reports
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2.15 Removal Response Subcontractor Documents
- Backfilling Weigh Tickets
- Bid Sheets/subcontracts
  - General
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2.16 Prime Contractor Direction Documents
- Purchase Requests/Delivery Orders & Modifications--ERCS
- Technical Direction Documents--TAT

2.18 CERCLA Off-Site Disposal Reports

10.7 Draft Administrative Orders

11.9 PRP-Specific Correspondence, Mr. Lawrence Levy

11.12 PRP-Related Documents
- Jard Company Drum Log Information
- Jard Company Manifests
- Jard Company MSDS Sheets

11.14 Title Searches/Deeds

13.3 Newspaper Articles

17.2 Access Agreements

17.4 Maps/Photographs

APPENDIX A

INTERIM WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL

APPENDIX A
INTERIM WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD CO. SITE – BENNINGTON, VERMONT
DRUMS AWAITING DISPOSAL 2/05/92

WASTE STREAM ABBREVIATIONS

RP = RING PUMP; UN #NA–9189; EPA WASTE CLASS #U028
PB = PAINT BOOTH WASH WATER; UN #NA–9189; EPA WASTE CLASS #F005
PS = PAINT SLUDGE; UN #NA–9189; EPA WASTE CLASS #F005
OSD = OILY SPEEDI–DRY; UN #9188
SP = SOLVENT PAINT; UN #1263; EPA WASTE CLASS #F005–D001
MC = WASTE METHYLENE CHLORIDE; UN #1593; EPA WASTE CLASS #F001
3TCA(V) = VIRGIN 1,1,1–TRICHLOROETHANE; UN #2831; EPA WASTE CLASS #F001
TCE = TRICHLOROETHENE; UN #1710; EPA WASTE CLASS #F001
DOPCW = DI–OCTYL–PHTHALATE, CLEANER AND WASTEWATER; NA #9189
MIAK = METHYL ISO–AMYL KETONE; UN#1993
T = TOLUENE; UN #1294
MEOH = METHYL ALCOHOL
* = DUPLICATE #

ANALYSES TYPE ABBREVIATIONS

COMP./DA = COMPOSITE SAMPLE FOR DISPOSAL ANALYSES
COMP./COMPAT. = COMPOSITE SAMPLE FOR COMPATIBILITY ANALYSES
COMPAT. = INDIVIDUAL DRUM SAMPLES FOR COMPATIBILITY ANALYSES

EPA #	JARD #	Interim Waste Stream	Analysis Type
1	2057	DOPCW	COMP./DA
2	2144	DOPCW	COMP./DA
3	2047	DOPCW	COMP./DA
4	2037	DOPCW	COMP./DA
5	2122	RP	COMP./COMPAT.
6	2132	DOPCW	COMP./DA
7	2158	DOPCW	COMP./DA
8	2157	DOPCW	COMP./DA
9	1983	DOPCW	COMP./DA
10	1990	RP	COMP./COMPAT.
11	2150	DOPCW	COMP./DA
12	2151	DOPCW	COMP./DA
13	2149	DOPCW	COMP./DA
14	2148	DOPCW	COMP./DA
15	1989	DOPCW	COMP./DA
16	1923*	RP	COMP./COMPAT.
17	2156	DOPCW	COMP./DA
18	2153	DOPCW	COMP./DA
19	2134	DOPCW	COMP./DA
20	2112	DOPCW	COMP./DA
21	2043	DOPCW	COMP./DA
22	2072	DOPCW	COMP./DA
23	2146	DOPCW	COMP./DA
24	2133	RP	COMP./COMPAT.
25	2054	DOPCW	COMP./DA
26	2014	DOPCW	COMP./DA
27	2019	DOPCW	COMP./DA
28	2025	DOPCW	COMP./DA
29	1994	DOPCW	COMP./DA
30	1992	DOPCW	COMP./DA
31	2020	RP	COMP./COMPAT.
32	2039	DOPCW	COMP./DA
33	2169	DOPCW	COMP./DA
34	2166	DOPCW	COMP./DA
35	2170	DOPCW	COMP./DA
36	2171	DOPCW	COMP./DA
37	2145	DOPCW	COMP./DA
38	2160	DOPCW	COMP./DA
39	2159	DOPCW	COMP./DA

APPENDIX A
INTERIM WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD CO. SITE – BENNINGTON, VERMONT
DRUMS AWAITING DISPOSAL 2/05/92

WASTE STREAM ABBREVIATIONS

RP = RING PUMP; UN #NA–9189; EPA WASTE CLASS #U028
PB = PAINT BOOTH WASH WATER; UN #NA–9189; EPA WASTE CLASS #F005
PS = PAINT SLUDGE; UN #NA–9189; EPA WASTE CLASS #F005
OSD = OILY SPEEDI–DRY; UN #9188
SP = SOLVENT PAINT; UN #1263; EPA WASTE CLASS #F005–D001
MC = WASTE METHYLENE CHLORIDE; UN #1593; EPA WASTE CLASS #F001
3TCA(V) = VIRGIN 1,1,1–TRICHLOROETHANE; UN #2831; EPA WASTE CLASS #F001
TCE = TRICHLOROETHENE; UN #1710; EPA WASTE CLASS #F001
DOPCW = DI–OCTYL–PHTHALATE, CLEANER AND WASTEWATER; NA #9189
MIAK = METHYL ISO–AMYL KETONE; UN#1993
T = TOLUENE; UN #1294
MEOH = METHYL ALCOHOL
* = DUPLICATE #

ANALYSES TYPE ABBREVIATIONS

COMP./DA = COMPOSITE SAMPLE FOR DISPOSAL ANALYSES
COMP./COMPAT. = COMPOSITE SAMPLE FOR COMPATIBILITY ANALYSES
COMPAT. = INDIVIDUAL DRUM SAMPLES FOR COMPATIBILITY ANALYSES

EPA #	JARD #	Interim Waste Stream	Analysis Type
40	2154	DOPCW	COMP./DA
41	2155	DOPCW	COMP./DA
42	2165	DOPCW	COMP./DA
43	2092	RP	COMP./COMPAT.
44	2147	RP	COMP./COMPAT.
45	2167	DOPCW	COMP./DA
46	2172	DOPCW	COMP./DA
47	2152	DOPCW	COMP./DA
48	2175	DOPCW	COMP./DA
49	1993	DOPCW	COMP./DA
50	1998	DOPCW	COMP./DA
51	2024	DOPCW	COMP./DA
52	2066	DOPCW	COMP./DA
53	2050	DOPCW	COMP./DA
54	2021	DOPCW	COMP./DA
55	2028	DOPCW	COMP./DA
56	2031	DOPCW	COMP./DA
57	2041	DOPCW	COMP./DA
58	2173	DOPCW	COMP./DA
59	2030	DOPCW	COMP./DA
60	2033	DOPCW	COMP./DA
61	2000	DOPCW	COMP./DA
62	1999	DOPCW	COMP./DA
63	2002	RP	COMP./COMPAT.
64	2001	RP	COMP./COMPAT.
65	2034	RP	COMP./COMPAT.
66	2029	DOPCW	COMP./DA
67	2044	DOPCW	COMP./DA
68	2032	DOPCW	COMP./DA
69	2027	DOPCW	COMP./DA
70	2022	DOPCW	COMP./DA
71	2052	DOPCW	COMP./DA
72	2071	DOPCW	COMP./DA
73	2026	DOPCW	COMP./DA
74	2139	DOPCW	COMP./DA
75	2136	DOPCW	COMP./DA
76	2055	DOPCW	COMP./DA
77	2045	DOPCW	COMP./DA
78	2077	DOPCW	COMP./DA

APPENDIX A
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JARD CO. SITE -- BENNINGTON, VERMONT
DRUMS AWAITING DISPOSAL 2/05/92

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PB = PAINT BOOTH WASH WATER; UN #NA-9189; EPA WASTE CLASS #F005
PS = PAINT SLUDGE; UN #NA-9189; EPA WASTE CLASS #F005
OSD = OILY SPEEDI-DRY; UN #9188
SP = SOLVENT PAINT; UN #1263; EPA WASTE CLASS #F005-D001
MC = WASTE METHYLENE CHLORIDE; UN #1593; EPA WASTE CLASS #F001
3TCA(V) = VIRGIN 1,1,1-TRICHLOROETHANE; UN #2831; EPA WASTE CLASS #F001
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ANALYSES TYPE ABBREVIATIONS

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COMPAT. = INDIVIDUAL DRUM SAMPLES FOR COMPATIBILITY ANALYSES

EPA #	JARD #	Interim Waste Stream	Analysis Type
79	2079	DOPCW	COMP./DA
80	2005	DOPCW	COMP./DA
81	2008	DOPCW	COMP./DA
82	2070	RP	COMP./COMPAT.
83	2040	DOPCW	COMP./DA
84	2004	DOPCW	COMP./DA
85	2013	RP	COMP./COMPAT.
86	2118	DOPCW	COMP./DA
87	2120	DOPCW	COMP./DA
88	2023	DOPCW	COMP./DA
89	2003	DOPCW	COMP./DA
90	2119	DOPCW	COMP./DA
91	2096	RP	COMP./COMPAT.
92	2038	DOPCW	COMP./DA
93	2007	DOPCW	COMP./DA
94	2006	DOPCW	COMP./DA
95	2083	DOPCW	COMP./DA
96	2082	DOPCW	COMP./DA
97	2067*	DOPCW	COMP./DA
98	2069	DOPCW	COMP./DA
99	2137	DOPCW	COMP./DA
100	2138	DOPCW	COMP./DA
101	2068	DOPCW	COMP./DA
102	2074	DOPCW	COMP./DA
103	2102	DOPCW	COMP./DA
104	2101	DOPCW	COMP./DA
105	2036	DOPCW	COMP./DA
106	2048*	DOPCW	COMP./DA
107	2130	DOPCW	COMP./DA
108	2128	DOPCW	COMP./DA
109	2107	DOPCW	COMP./DA
110	2106*	DOPCW	COMP./DA
111	2141	DOPCW	COMP./DA
112	2142	DOPCW	COMP./DA
113	2098	DOPCW	COMP./DA
114	2080	DOPCW	COMP./DA
115	2011	DOPCW	COMP./DA
116	2010	DOPCW	COMP./DA
117	2009	DOPCW	COMP./DA

APPENDIX A
INTERIM WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD CO. SITE – BENNINGTON, VERMONT
DRUMS AWAITING DISPOSAL 2/05/92

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EPA #	JARD #	Interim Waste Stream	Analysis Type
118	2012	DOPCW	COMP./DA
119	2048*	DOPCW	COMP./DA
120	2099	DOPCW	COMP./DA
121	2135*	DOPCW	COMP./DA
122	2140	DOPCW	COMP./DA
123	2104	DOPCW	COMP./DA
124	2105	DOPCW	COMP./DA
125	2123	DOPCW	COMP./DA
126	2131	DOPCW	COMP./DA
127	2073	DOPCW	COMP./DA
128	2100	DOPCW	COMP./DA
129	2103	DOPCW	COMP./DA
130	2046	DOPCW	COMP./DA
131	2049	DOPCW	COMP./DA
132	2084	PB	COMP./COMPAT.
133	2085	PB	COMP./COMPAT.
134	2086	PB	COMP./COMPAT.
135	2051	DOPCW	COMP./DA
136	2081	DOPCW	COMP./DA
137	2078	DOPCW	COMP./DA
138	2035	RP	COMP./COMPAT.
139	2087	PB	COMP./COMPAT.
140	2088	PB	COMP./COMPAT.
141	2095	WASTE OIL	COMPAT.
142	2174	OSD	COMP/DA
143	----	----	COMPAT.
144	----	----	COMPAT.
145	----	----	COMPAT.
146	2177	DOPCW	COMP./DA
147	----	----	COMPAT.
148	2089	PB	COMP./COMPAT.
149	2178	DOPCW	COMP./DA
150	2168	RP	COMP./COMPAT.
151	----	----	COMPAT.
155	----	----	COMPAT.
157	----	----	COMPAT.
158	----	----	COMPAT.
159	----	----	COMPAT.
160	----	----	COMPAT.

APPENDIX A
INTERIM WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD CO. SITE – BENNINGTON, VERMONT
DRUMS AWAITING DISPOSAL 2/05/92

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EPA #	JARD #	Interim Waste Stream	Analysis Type
161	----	----	COMPAT.
162	----	CAUSTIC FLAKE	LAB PACK
163	----	CAUSTIC FLAKE	LAB PACK
164	----	----	COMPAT.
166	1918	SP	COMPAT.
167	----	----	COMPAT.
168	----	----	COMPAT.
169	----	----	COMPAT.
170	----	MIAK (V)	LAB PACK
171	----	MIAK	COMPAT.
172	----	T	COMPAT.
174	2108	3TCA	COMPAT.
175	2143	PS	COMPAT.
176	----	TCE	COMPAT.
177	2176	TCE	COMPAT.
180	----	----	COMPAT.
183	----	MEOH	COMPAT.
184	----	----	COMPAT.
187	2109	TCE	COMPAT.
188	2093	MEC	COMPAT.
189	----	MEC	COMPAT.
191	----	EXXATE 600	COMPAT.
192	----	----	COMPAT.
193	----	----	COMPAT.
194	----	----	COMPAT.
195	1002	----	COMPAT.
196	1821	----	COMPAT.
197	1245	----	COMPAT.
198	----	----	COMPAT.
199	----	----	COMPAT.
200	----	----	COMPAT.
201	----	----	COMPAT.
202	----	----	COMPAT.
203	----	----	COMPAT.
205	----	----	COMPAT.
206	----	----	COMPAT.
208	----	----	COMPAT.
209	----	----	COMPAT.
212	----	ZINC POWDER	LAB PACK

APPENDIX A
INTERIM WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD CO. SITE – BENNINGTON, VERMONT
DRUMS AWAITING DISPOSAL 2/05/92

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EPA #	JARD #	Interim Waste Stream	Analysis Type
218	----	----	COMPAT.
219	----	----	COMPAT.
220	----	----	COMPAT.
221	----	----	COMPAT.
222	----	----	COMPAT.
223	----	----	COMPAT.
224	----	----	COMPAT.
225	----	----	COMPAT.
226	----	----	COMPAT.
227	----	ZINC AND DIRT	COMP./DA
228	----	ZINC AND DIRT	COMP./DA
229	----	ZINC AND DIRT	COMP./DA
230	1803	ZINC AND DIRT	COMP./DA
231	2162	ZINC AND DIRT	COMP./DA
232	2161	OSD	COMP./DA
238	----	OSD	COMP./DA
240	1836	ZINC (GORETEX)	COMP./DA
241	1856	CAPACITORS	NONE
242	1824	CAPACITORS	NONE
243	1837	ZINC (GORETEX)	COMP./DA
244	1823	CAPACITORS	NONE
246	----	ZINC (GORETEX)	COMP./DA
247	----	ZINC (GORETEX)	COMP./DA
248	----	PB SLUDGE	COMPAT.
249	----	PB	COMP./COMPAT.
257	----	----	COMPAT.
262	----	DOPCW	COMP./DA.
276	----	----	COMPAT.
279	----	----	COMPAT.
280	----	OSD	COMP./DA
281	----	WASHER WATER	COMP./COMPAT.
282	----	WASHER WATER	COMP./COMPAT.
283	----	WASHER WATER	COMP./COMPAT.
284	----	WASHER WATER	COMP./COMPAT.
285	----	WASHER WATER	COMP./COMPAT.
286	----	WASHER WATER	COMP./COMPAT.
287	----	WASHER WATER	COMP./COMPAT.
288	----	WASHER WATER	COMP./COMPAT.
289	----	WASHER WATER	COMP./COMPAT.

APPENDIX A
INTERIM WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD CO. SITE – BENNINGTON, VERMONT
DRUMS AWAITING DISPOSAL 2/05/92

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COMPAT. = INDIVIDUAL DRUM SAMPLES FOR COMPATIBILITY ANALYSES

EPA #	JARD #	Interim Waste Stream	Analysis Type
290	----	DOP	PCB ONLY
291	----	IMPREGNATOR	COMP./COMPAT.
292	----	IMPREGNATOR	COMP./COMPAT.
293	----	IMPREGNATOR	COMP./COMPAT.
294	----	IMPREGNATOR	COMP./COMPAT.
295	----	IMPREGNATOR	COMP./COMPAT.
296	----	IMPREGNATOR	COMP./COMPAT.
297	----	CRUSH DECON	COMPAT.
298	----	SOLIDS FROM CRUSH	COMP./DA
299	----	SOLIDS FROM CRUSH	COMP./DA
300	----	OSD	COMP./DA
301		PB	COMP./COMPAT.
302		SST OIL/WATER	COMPAT.
303		SST OIL/WATER	COMPAT.
304		WASHER WATER	COMP./COMPAT.
305		IMPREGNATOR	COMP./COMPAT.
306		IMPREGNATOR	COMP./COMPAT.
307		FLOOR DECON	COMP./COMPAT.
308		FLOOR DECON	COMP./COMPAT.
309		FLOOR DECON	COMP./COMPAT.
310		IPBP TANK #7	PCB ONLY
311		OSD	COMP./DA
312		OSD	COMP./DA
313		FLOOR DECON	COMP./COMPAT.
314		FLOOR DECON	COMP./COMPAT.
315		FLOOR DECON	COMP./COMPAT.
316		GLASSWARE	ON HOLD
317		PB	COMP./COMPAT.
318		PB	COMP./COMPAT.
319		PB	COMP./COMPAT.
320		ZINC (GORETEX)	COMP./DA

APPENDIX B

FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL

APPENDIX B
FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD COMPANY SITE
BENNINGTON, VT

WASTE STREAMS

DOPCW (DOP Oil, Cleaner and Water)
PCB Decon Water
PCB Solids/Sludges
PCB Oil/Solvents
PCB Contaminated Soil and Debris (Goretex Filters and Zinc Dust/Dirt were Bulked into this Waste Stream)
Rejected Capacitors
TSCA Regulated Tank Waste
Non-TSCA Regulated Tank Waste
Empty Drums and Containers
Zinc Dust
Non-CERCLA Regulated Waste
Common Chemical or Trade Name is used for Material Returned to the Manufacturer or Disposed of as Off-specification, Unused Product
Labpack #
* = Contents Bulked into Other Drums in the Specified Waste Stream

EPA Drum #	Final EPA Waste Stream
1	DOPCW (DOP Oil, Cleaner and Water)
2	DOPCW (DOP Oil, Cleaner and Water)
3	DOPCW (DOP Oil, Cleaner and Water)
4	DOPCW (DOP Oil, Cleaner and Water)
5	PCB Decon Water
6	DOPCW (DOP Oil, Cleaner and Water)
7	DOPCW (DOP Oil, Cleaner and Water)
8	DOPCW (DOP Oil, Cleaner and Water)
9	DOPCW (DOP Oil, Cleaner and Water)
10	PCB Decon Water
11	DOPCW (DOP Oil, Cleaner and Water)
12	DOPCW (DOP Oil, Cleaner and Water)
13	DOPCW (DOP Oil, Cleaner and Water)
14	DOPCW (DOP Oil, Cleaner and Water)
15	DOPCW (DOP Oil, Cleaner and Water)
16	PCB Decon Water
17	DOPCW (DOP Oil, Cleaner and Water)
18	DOPCW (DOP Oil, Cleaner and Water)
19	DOPCW (DOP Oil, Cleaner and Water)
20	DOPCW (DOP Oil, Cleaner and Water)
21	DOPCW (DOP Oil, Cleaner and Water)
22	DOPCW (DOP Oil, Cleaner and Water)
23	DOPCW (DOP Oil, Cleaner and Water)
24	PCB Decon Water
25	DOPCW (DOP Oil, Cleaner and Water)
26	DOPCW (DOP Oil, Cleaner and Water)
27	DOPCW (DOP Oil, Cleaner and Water)
28	DOPCW (DOP Oil, Cleaner and Water)
29	DOPCW (DOP Oil, Cleaner and Water)
30	DOPCW (DOP Oil, Cleaner and Water)
31	PCB Decon Water
32	DOPCW (DOP Oil, Cleaner and Water)
33	DOPCW (DOP Oil, Cleaner and Water)
34	DOPCW (DOP Oil, Cleaner and Water)
35	DOPCW (DOP Oil, Cleaner and Water)
36	DOPCW (DOP Oil, Cleaner and Water)
37	DOPCW (DOP Oil, Cleaner and Water)
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41	DOPCW (DOP Oil, Cleaner and Water)
42	DOPCW (DOP Oil, Cleaner and Water)
43	PCB Decon Water
44	PCB Decon Water
45	DOPCW (DOP Oil, Cleaner and Water)
46	DOPCW (DOP Oil, Cleaner and Water)
47	DOPCW (DOP Oil, Cleaner and Water)
48	DOPCW (DOP Oil, Cleaner and Water)
49	DOPCW (DOP Oil, Cleaner and Water)
50	DOPCW (DOP Oil, Cleaner and Water)
51	DOPCW (DOP Oil, Cleaner and Water)
52	DOPCW (DOP Oil, Cleaner and Water)
53	DOPCW (DOP Oil, Cleaner and Water)
54	DOPCW (DOP Oil, Cleaner and Water)
55	DOPCW (DOP Oil, Cleaner and Water)
56	DOPCW (DOP Oil, Cleaner and Water)
57	DOPCW (DOP Oil, Cleaner and Water)
58	DOPCW (DOP Oil, Cleaner and Water)
59	DOPCW (DOP Oil, Cleaner and Water)
60	DOPCW (DOP Oil, Cleaner and Water)
61	DOPCW (DOP Oil, Cleaner and Water)
62	DOPCW (DOP Oil, Cleaner and Water)
63	PCB Decon Water
64	PCB Decon Water
65	PCB Decon Water
66	DOPCW (DOP Oil, Cleaner and Water)
67	DOPCW (DOP Oil, Cleaner and Water)
68	DOPCW (DOP Oil, Cleaner and Water)
69	DOPCW (DOP Oil, Cleaner and Water)
70	DOPCW (DOP Oil, Cleaner and Water)
71	DOPCW (DOP Oil, Cleaner and Water)
72	DOPCW (DOP Oil, Cleaner and Water)
73	DOPCW (DOP Oil, Cleaner and Water)
74	DOPCW (DOP Oil, Cleaner and Water)
75	DOPCW (DOP Oil, Cleaner and Water)
76	DOPCW (DOP Oil, Cleaner and Water)
77	DOPCW (DOP Oil, Cleaner and Water)
78	DOPCW (DOP Oil, Cleaner and Water)
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80	DOPCW (DOP Oil, Cleaner and Water)

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82	PCB Decon Water
83	DOPCW (DOP Oil, Cleaner and Water)
84	DOPCW (DOP Oil, Cleaner and Water)
85	PCB Decon Water
86	DOPCW (DOP Oil, Cleaner and Water)
87	DOPCW (DOP Oil, Cleaner and Water)
88	DOPCW (DOP Oil, Cleaner and Water)
89	DOPCW (DOP Oil, Cleaner and Water)
90	DOPCW (DOP Oil, Cleaner and Water)
91	PCB Decon Water
92	DOPCW (DOP Oil, Cleaner and Water)
93	DOPCW (DOP Oil, Cleaner and Water)
94	DOPCW (DOP Oil, Cleaner and Water)
95	DOPCW (DOP Oil, Cleaner and Water)
96	DOPCW (DOP Oil, Cleaner and Water)
97	DOPCW (DOP Oil, Cleaner and Water)
98	DOPCW (DOP Oil, Cleaner and Water)
99	DOPCW (DOP Oil, Cleaner and Water)
100	DOPCW (DOP Oil, Cleaner and Water)
101	DOPCW (DOP Oil, Cleaner and Water)
102	DOPCW (DOP Oil, Cleaner and Water)
103	DOPCW (DOP Oil, Cleaner and Water)
104	DOPCW (DOP Oil, Cleaner and Water)
105	DOPCW (DOP Oil, Cleaner and Water)
106	DOPCW (DOP Oil, Cleaner and Water)
107	DOPCW (DOP Oil, Cleaner and Water)
108	DOPCW (DOP Oil, Cleaner and Water)
109	DOPCW (DOP Oil, Cleaner and Water)
110	DOPCW (DOP Oil, Cleaner and Water)
111	DOPCW (DOP Oil, Cleaner and Water)
112	DOPCW (DOP Oil, Cleaner and Water)
113	DOPCW (DOP Oil, Cleaner and Water)
114	DOPCW (DOP Oil, Cleaner and Water)
115	DOPCW (DOP Oil, Cleaner and Water)
116	DOPCW (DOP Oil, Cleaner and Water)
117	DOPCW (DOP Oil, Cleaner and Water)
118	DOPCW (DOP Oil, Cleaner and Water)
119	DOPCW (DOP Oil, Cleaner and Water)
120	DOPCW (DOP Oil, Cleaner and Water)

APPENDIX B
FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD COMPANY SITE
BENNINGTON, VT

WASTE STREAMS

DOPCW (DOP Oil, Cleaner and Water)
PCB Decon Water
PCB Solids/Sludges
PCB Oil/Solvents
PCB Contaminated Soil and Debris (Goretex Filters and Zinc Dust/Dirt were Bulked into this Waste Stream)
Rejected Capacitors
TSCA Regulated Tank Waste
Non-TSCA Regulated Tank Waste
Empty Drums and Containers
Zinc Dust
Non-CERCLA Regulated Waste
Common Chemical or Trade Name is used for Material Returned to the Manufacturer or Disposed of as Off-specification, Unused Product
Labpack #
* = Contents Bulked into Other Drums in the Specified Waste Stream

EPA Drum #	Final EPA Waste Stream
121	DOPCW (DOP Oil, Cleaner and Water)
122	DOPCW (DOP Oil, Cleaner and Water)
123	DOPCW (DOP Oil, Cleaner and Water)
124	DOPCW (DOP Oil, Cleaner and Water)
125	DOPCW (DOP Oil, Cleaner and Water)
126	DOPCW (DOP Oil, Cleaner and Water)
127	DOPCW (DOP Oil, Cleaner and Water)
128	DOPCW (DOP Oil, Cleaner and Water)
129	DOPCW (DOP Oil, Cleaner and Water)
130	DOPCW (DOP Oil, Cleaner and Water)
131	DOPCW (DOP Oil, Cleaner and Water)
132	PCB Oil/Solvents
133	PCB Oil/Solvents
134	PCB Oil/Solvents
135	DOPCW (DOP Oil, Cleaner and Water)
136	DOPCW (DOP Oil, Cleaner and Water)
137	DOPCW (DOP Oil, Cleaner and Water)
138	PCB Decon Water
139	PCB Oil/Solvents
140	PCB Oil/Solvents
141	PCB Oil/Solvents
142	PCB Solids/Sludges
143	PCB Oil/Solvents
144	PCB Solids/Sludges
145	PCB Oil/Solvents
146	DOPCW (DOP Oil, Cleaner and Water)
147 (Layer 1)	PCB Oil/Solvents*
147 (Layer 2)	PCB Solids/Sludges*
148	PCB Oil/Solvents
149	DOPCW (DOP Oil, Cleaner and Water)
150	PCB Decon Water
151	PCB Solids/Sludges*
152	Empty Drums and Containers
153	Empty Drums and Containers
154	Empty Drums and Containers
155	Spray 83
156	Empty Drums and Containers
157	Oakite STC
158	Oakite STC
159	Oakite STC

APPENDIX B
FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD COMPANY SITE
BENNINGTON, VT

WASTE STREAMS

DOPCW (DOP Oil, Cleaner and Water)
PCB Decon Water
PCB Solids/Sludges
PCB Oil/Solvents
PCB Contaminated Soil and Debris (Goretex Filters and Zinc Dust/Dirt were Bulked into this Waste Stream)
Rejected Capacitors
TSCA Regulated Tank Waste
Non-TSCA Regulated Tank Waste
Empty Drums and Containers
Zinc Dust
Non-CERCLA Regulated Waste
Common Chemical or Trade Name is used for Material Returned to the Manufacturer or Disposed of as Off-specification, Unused Product
Labpack #
* = Contents Bulked into Other Drums in the Specified Waste Stream

EPA Drum #	Final EPA Waste Stream
160	Oakite STC
161	JC-3
162	Labpack #12
163	Labpack #12
164	Oakite 202
165	Hydrochloric Acid
166	PCB Oil/Solvents
167	PCB Oil/Solvents
168	PCB Oil/Solvents
169	PCB Oil/Solvents
170	Labpack #33
171	PCB Oil/Solvents
172	PCB Oil/Solvents
173	PCB Oil/Solvents*
174	PCB Oil/Solvents
175	PCB Solids/Sludges
176	PCB Oil/Solvents
177	PCB Oil/Solvents
178	PCB Oil/Solvents*
179	Methanol
180	PCB Oil/Solvents
181	Methanol
182	Methanol
183	PCB Oil/Solvents
184	PCB Oil/Solvents
185	1,1,1-Trichloroethane
186	PCB Oil/Solvents*
187	PCB Oil/Solvents
188	PCB Oil/Solvents
189	PCB Oil/Solvents
190	PCB Oil/Solvents*
191	PCB Oil/Solvents
192	PCB Oil/Solvents
193	PCB Oil/Solvents
194	PCB Oil/Solvents
195	PCB Oil/Solvents
196	PCB Oil/Solvents
197	PCB Oil/Solvents
198 (Layer 1)	PCB Oil/Solvents*
198 (Layer 2)	PCB Solids/Sludges*

APPENDIX B
FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD COMPANY SITE
BENNINGTON, VT

WASTE STREAMS

DOPCW (DOP Oil, Cleaner and Water)
PCB Decon Water
PCB Solids/Sludges
PCB Oil/Solvents
PCB Contaminated Soil and Debris (Goretex Filters and Zinc Dust/Dirt were Bulked into this Waste Stream)
Rejected Capacitors
TSCA Regulated Tank Waste
Non-TSCA Regulated Tank Waste
Empty Drums and Containers
Zinc Dust
Non-CERCLA Regulated Waste
Common Chemical or Trade Name is used for Material Returned to the Manufacturer or Disposed of as Off-specification, Unused Product
Labpack #
* = Contents Bulked into Other Drums in the Specified Waste Stream

EPA Drum #	Final EPA Waste Stream
199	PCB Oil/Solvents
200	Paraplex G-60
201	PCB Oil/Solvents
202	PCB Oil/Solvents
203	PCB Oil/Solvents
204	1000 Waterborne Insulating Varnish (2-Butoxyethanol dimethylamine ethanol)
205	PCB Oil/Solvents
206	PCB Oil/Solvents
207	1000 Waterborne Insulating Varnish (2-Butoxyethanol dimethylamine ethanol)
208	PCB Oil/Solvents
209	PCB Oil/Solvents
210	Labpack #22
211	Labpack #30
212	Labpack #20
213	Zinc Dust
214	Zinc Dust
215	Zinc Dust
216	Zinc Dust
217	Zinc Dust
218	PCB Oil/Solvents
219	PCB Oil/Solvents
220	Oakite 160
221	Oakite Cryscoat 147
222	Oakite Cryscoat 147
223	Metacote AS-5
224	PCB Solids/Sludges*
225	PCB Oil/Solvents
226	PCB Oil/Solvents
227	PCB Contaminated Soil and Debris
228	PCB Contaminated Soil and Debris
229	PCB Contaminated Soil and Debris
230	PCB Contaminated Soil and Debris
231	PCB Contaminated Soil and Debris
232	PCB Solids/Sludges
233	Zinc Dust
234	Zinc Dust
235	Zinc Dust
236	Zinc Dust

APPENDIX B
FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD COMPANY SITE
BENNINGTON, VT

WASTE STREAMS

DOPCW (DOP Oil, Cleaner and Water)
PCB Decon Water
PCB Solids/Sludges
PCB Oil/Solvents
PCB Contaminated Soil and Debris (Goretex Filters and Zinc Dust/Dirt were Bulked into this Waste Stream)
Rejected Capacitors
TSCA Regulated Tank Waste
Non-TSCA Regulated Tank Waste
Empty Drums and Containers
Zinc Dust
Non-CERCLA Regulated Waste
Common Chemical or Trade Name is used for Material Returned to the Manufacturer or Disposed of as Off-specification, Unused Product
Labpack #
* = Contents Bulked into Other Drums in the Specified Waste Stream

EPA Drum #	Final EPA Waste Stream
237	Zinc Dust
238	PCB Solids/Sludges
239	Non-CERCLA Regulated Waste
240	PCB Contaminated Soil and Debris
241	Rejected Capacitors
242	Rejected Capacitors
243	PCB Contaminated Soil and Debris
244	Rejected Capacitors
245	Non-CERCLA Regulated Waste
246	PCB Contaminated Soil and Debris
247	PCB Contaminated Soil and Debris
248 (Layer 1)	PCB Oil/Solvents*
248 (Layer 2)	PCB Solids/Sludges
249	PCB Oil/Solvents
250	PCB Solids/Sludges*
251	Empty Drums and Containers
252	Empty Drums and Containers
253	PCB Solids/Sludges*
254	Empty Drums and Containers
255	PCB Solids/Sludges*
256	PCB Solids/Sludges*
257	PCB Oil/Solvents
258	PCB Solids/Sludges*
259	PCB Solids/Sludges*
260	PCB Solids/Sludges*
261	PCB Solids/Sludges*
262	DOPCW (DOP Oil, Cleaner and Water)
263	PCB Solids/Sludges*
264	PCB Solids/Sludges*
265	PCB Solids/Sludges*
266	PCB Solids/Sludges*
267	PCB Solids/Sludges*
268	Empty Drums and Containers
269	PCB Solids/Sludges*
270	PCB Solids/Sludges*
271	Empty Drums and Containers
272	PCB Solids/Sludges*
273	PCB Solids/Sludges*
274	Empty Drums and Containers
275	Empty Drums and Containers

APPENDIX B
FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD COMPANY SITE
BENNINGTON, VT

WASTE STREAMS

DOPCW (DOP Oil, Cleaner and Water)
PCB Decon Water
PCB Solids/Sludges
PCB Oil/Solvents
PCB Contaminated Soil and Debris (Goretex Filters and Zinc Dust/Dirt were Bulked into this Waste Stream)
Rejected Capacitors
TSCA Regulated Tank Waste
Non-TSCA Regulated Tank Waste
Empty Drums and Containers
Zinc Dust
Non-CERCLA Regulated Waste
Common Chemical or Trade Name is used for Material Returned to the Manufacturer or Disposed of as Off-specification, Unused Product
Labpack #
* = Contents Bulked into Other Drums in the Specified Waste Stream

EPA Drum #	Final EPA Waste Stream
276	PCB Oil/Solvents
277	Empty Drums and Containers
278	PCB Solids/Sludges*
279	PCB Oil/Solvents
280	PCB Solids/Sludges
281	PCB Decon Water
282	PCB Decon Water
283	PCB Decon Water
284	PCB Decon Water
285	PCB Decon Water
286	PCB Decon Water
287	PCB Decon Water
288	PCB Decon Water
289	PCB Decon Water
290	TSCA Regulated Tank Waste
291	PCB Decon Water
292	PCB Decon Water
293	PCB Decon Water
294	PCB Decon Water
295	PCB Decon Water
296	PCB Decon Water
297	PCB Oil/Solvents
298	PCB Solids/Sludges
299	PCB Solids/Sludges
300	PCB Solids/Sludges
301	PCB Oil/Solvents
302	PCB Oil/Solvents
303	PCB Oil/Solvents
304	PCB Decon Water
305	PCB Decon Water
306	PCB Decon Water
307	PCB Decon Water
308	PCB Decon Water
309	PCB Decon Water
310	TSCA Regulated Tank Waste
311	PCB Solids/Sludges
312	PCB Solids/Sludges
313	PCB Decon Water
314	PCB Decon Water
315	PCB Decon Water

APPENDIX B
FINAL WASTE STREAM CLASSIFICATIONS FOR DRUMMED MATERIAL
JARD COMPANY SITE
BENNINGTON, VT

WASTE STREAMS

DOPCW (DOP Oil, Cleaner and Water)
PCB Decon Water
PCB Solids/Sludges
PCB Oil/Solvents
PCB Contaminated Soil and Debris (Goretex Filters and Zinc Dust/Dirt were Bulked into this Waste Stream)
Rejected Capacitors
TSCA Regulated Tank Waste
Non-TSCA Regulated Tank Waste
Empty Drums and Containers
Zinc Dust
Non-CERCLA Regulated Waste
Common Chemical or Trade Name is used for Material Returned to the Manufacturer or Disposed of as Off-specification, Unused Product
Labpack #
* = Contents Bulked into Other Drums in the Specified Waste Stream

EPA Drum #	Final EPA Waste Stream
316	PCB Contaminated Soil and Debris
317	PCB Oil/Solvents
318	PCB Oil/Solvents
319	PCB Oil/Solvents
320	PCB Contaminated Soil and Debris
321	PCB Contaminated Soil and Debris
322	PCB Contaminated Soil and Debris
323	PCB Contaminated Soil and Debris
324	PCB Contaminated Soil and Debris
N/A	Dimethylaminoethanol
N/A	2-Chloroanthraquinone

APPENDIX C

WASTE DISPOSAL SUMMARY TABLE

APPENDIX C
WASTE DISPOSAL SUMMARY TABLE
JARD COMPANY SITE
BENNINGTON, VT

Item/ Waste Stream	DOT Shipping Name	Disposal Company/ Broker	Transporter	Ultimate Disposal Facility	Disposal Method	Volume/ Quantity	Date Shipped	Manifest Doc. No. or Bill of Lading (B/L)
Zinc Dust	Zinc Scrap	A. Shapiro	A. Shapiro	A. Shapiro	Recycle	300 gal	1/30/92	B/L
1000 Waterborne Insulating Varnish (Unused product)	2-butoxyethanol dimethyl-amine ethanol	Essex Corp. c/o P.D. George Essex, MO	Yellow Freight	Essex Corp. c/o P.D. George St. Louis, MO	NA	950 lbs	2/4/92	B/L #5002594
Hydrochloric Acid (Unused product)	Hydrochloric Acid, Corrosive Material, UN 1789	Astro Chemical, Rutland, VT	Astro Chemical	Astro Chemical, Rutland, VT	NA	160 lbs	2/5/92	B/L #0205
1,1,1-Trichloroethane (Unused product)	1,1,1-Trichloroethane, ORM-A, UN 2831	Astro Chemical, Rutland, VT	Astro Chemical	Astro Chemical, Rutland, VT	NA	640 lbs	2/5/92	B/L #0205
Methanol (Unused product)	Methyl Alchohol, Flammable Liquid, UN 1230	Astro Chemical, Rutland, VT	Astro Chemical	Astro Chemical, Rutland, VT	NA	1200 lbs	2/5/92	B/L #0205
Rejected Capacitors	Non-Hazardous, Non-PCB Type Capacitors and Debris	Waste Technology Services Niagara Falls, NY	West Central Environmental Corp.	Modern Landfill, Inc. Model City, NY	LF	30,000 lbs	3/17/92	B/L #4A-106
Rejected Capacitors	Non-Hazardous, Non-PCB Type Capacitors and Debris	Waste Technology Services Niagara Falls, NY	West Central Environmental Corp.	Modern Landfill, Inc. Model City, NY	LF	30,000 lbs	3/17/92	B/L #4A-106
Labpack Drum #1	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	100 lbs.	3/24/92	MAG583222
Labpack Drum #2	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	100 lbs.	3/24/92	MAG583222
Labpack Drum #3	RQ Waste Acid Liquid, n.o.s. (Sulfuric acid, Chromic acid)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	INC	100 lbs.	3/24/92	MAG583220
Labpack Drum #4	Waste Alkaline Liquid, n.o.s. (Sodium Hydroxide)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	100 lbs.	3/24/92	MAG583219
Labpack Drum #5	RQ Waste Corrosive Liquid, Poisonous, n.o.s. (Phenol, Methylene Chloride)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	100 lbs.	3/24/92	MAG583218
Labpack Drum #6	RQ Waste Poison B Solid, n.o.s. (Mercury)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	40 lbs.	3/24/92	MAG583219
Labpack Drum #7	Waste Titanium Tetrachloride	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	20 lbs.	3/24/92	MAG583221
Labpack Drum #8	Waste Acetic Anhydride	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	20 lbs.	3/24/92	MAG583219
Labpack Drum #9	RQ Hazardous Substance Solid, n.o.s. (Cupric)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	20 lbs.	3/24/92	MAG583218

NA – Not Available
LF – Landfill
INC – Incineration

APPENDIX C
WASTE DISPOSAL SUMMARY TABLE
JARD COMPANY SITE
BENNINGTON, VT

Item/ Waste Stream	DOT Shipping Name	Disposal Company/ Broker	Transporter	Ultimate Disposal Facility	Disposal Method	Volume/ Quantity	Date Shipped	Manifest Doc. No. or Bill of Lading (B/L)
Labpack Drum #10	Waste Oxidizer, Corrosive Liquid, n.o.s. (Perchloric Acid, Acetic Acid)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	N	20 lbs.	3/24/92	MAG583220
Labpack Drum #11	RQ Waste Oxidizer, Corrosive Liquid, n.o.s. (Silver Nitrate, Nitric Acid)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	N	20 lbs.	3/24/92	MAG583218
Labpack Drum #12	Sodium Hyroxide, Dry Solid	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	400 lbs.	3/24/92	MAG583219
Labpack Drum #13	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	200 lbs.	3/24/92	MAG583223
Labpack Drum #14	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	200 lbs.	3/24/92	MAG583222
Labpack Drum #15	RQ Waste Alkaline Liquid, n.o.s. (Ammonium Hydroxide)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	N	200 lbs.	3/24/92	MAG583218
Labpack Drum #16	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	400 lbs.	3/24/92	MAG583223
Labpack Drum #17	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	400 lbs.	3/24/92	MAG583223
Labpack Drum #18	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	200 lbs.	3/24/92	MAG583223
Labpack Drum #19	RQ Waste Combustible Liquid, n.o.s. (Petroleum Distillates)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	INC	200 lbs.	3/24/92	MAG583217
Labpack Drum #20	Non-regulated Material	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	GSX Services Pinewood, SC	LF	400 lbs.	3/24/92	MAG583224
Labpack Drum #21	RQ Waste Flammable Liquid, n.o.s. (Petroleum Distillate, Xylene)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Laidlaw Environmental Services, Roebuck, SC	INC	200 lbs.	3/24/92	MAG583217
Labpack Drum #22	RQ Waste Flammable Liquid, n.o.s. (Xylene, Toluene)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	INC	200 lbs.	3/24/92	MAG583216
Labpack Drum #23	RQ Waste Flammable Liquid, n.o.s. (Methanol, Methylene Chloride)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Laidlaw Environmental Services, Roebuck, SC	INC	200 lbs.	3/24/92	MAG583215

N – Neutralization
LF – Landfill
INC – Incineration

APPENDIX C
WASTE DISPOSAL SUMMARY TABLE
JARD COMPANY SITE
BENNINGTON, VT

Item/ Waste Stream	DOT Shipping Name	Disposal Company/ Broker	Transporter	Ultimate Disposal Facility	Disposal Method	Volume/ Quantity	Date Shipped	Manifest Doc. No. or Bill of Lading (B/L)
Labpack Drum #24	RQ Waste Flammable Liquid, n.o.s. (Toluene, Methyl Ethyl Ketone)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	N	200 lbs.	3/24/92	MAG583215
Labpack Drum #25	RQ Waste Flammable Liquid, n.o.s. (Petroleum Distillates, Toluene)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Laidlaw Environmental Services, Roebuck, SC	INC	200 lbs.	3/24/92	MAG583216
Labpack Drum #26	RQ Waste Flammable Liquid, n.o.s. (Xylene, Methyl Ethyl Ketone)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Laidlaw Environmental Services, Roebuck, SC	INC	200 lbs.	3/24/92	MAG583215
Labpack Drum #27	RQ Waste Flammable Liquid, n.o.s. (Toluene, Xylene)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	N	200 lbs.	3/24/92	MAG583217
Labpack Drum #28	Waste Flammable Liquid, n.o.s. (Acetone, Chlorobenzene)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	100 lbs.	3/24/92	MAG583222
Labpack Drum #29	RQ Waste Flammable Liquid, n.o.s. (Petroleum Distillates)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	100 lbs.	3/24/92	MAG583221
Labpack Drum #30	RQ Waste Flammable Liquid, n.o.s. (Xylene, Toluene)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	100 lbs.	3/24/92	MAG583221
Labpack Drum #31	RQ Waste Flammable Liquid, n.o.s. (Petroleum Distillates)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	100 lbs.	3/24/92	MAG583217
Labpack Drum #32	Waste Flammable Liquid, Corrosive, n.o.s. (Potassium Hydroxide, Methanol)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	100 lbs.	3/24/92	MAG583221
Labpack Drum #33	Waste Flammable Liquid, n.o.s. (Methyl isoamyl ketone)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Keystone Cement Bath, PA	INC	500 lbs.	3/24/92	MAG583220
Labpack Drum #34	Waste Flammable Liquid, n.o.s. (Pyridine)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	Heritage Environmental Indianapolis, IN	INC	20 lbs.	3/24/92	MAG583215
Labpack Drum #35	Waste Flammable Liquid, Corrosive, n.o.s. (Pyridine, Acetic Anhydride)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	20 lbs.	3/24/92	MAG583216
Labpack Drum #36	Waste Flammable Liquid, Poisonous, n.o.s. (Xylene, Chloropyrifos)	Laidlaw Environmental Services North Andover/Lawerence, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	20 lbs.	3/24/92	MAG583220

N – Neutralization
INC – Incineration

APPENDIX C
WASTE DISPOSAL SUMMARY TABLE
JARD COMPANY SITE
BENNINGTON, VT

Item/ Waste Stream	DOT Shipping Name	Disposal Company/ Broker	Transporter	Ultimate Disposal Facility	Disposal Method	Volume/ Quantity	Date Shipped	Manifest Doc. No. or Bill of Lading (B/L)
Labpack Drum #37	Flammable Solid, n.o.s. (Iron Powder)	Laidlaw Environmental Services Andover, MA	Laidlaw Environmental Services	ENSCO El Dorado, AR	INC	20 lbs.	3/24/92	MAG583216
Dimethylaminoethanol (Unused product)	Waste Corrosive Liquid, n.o.s. (Dimethylaminoethanol)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	ENSCO El Dorado, AR	INC	5 gals.	6/3/92	NJA1464454
2-Chloroanthraquinone (Unused product)	Waste Chemical Process Solid (2-Chloroanthraquinone)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	Michigan Disposal, Inc. Belleville, MI	LF	55 gals.	6/3/92	NJA1464454
Oakite 202 (Unused product)	Waste Alkaline Liquid, n.o.s. (Sodium Silicate, 2-Butoxyethanol)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	E.I. Dupont Denemours, Inc. Deepwater, NJ	WWT	55 gals.	6/3/92	NJA1464453
Oakite 160 (Unused product)	Waste Corrosive Solid, n.o.s. (Sodium Hydroxide, Sodium Carbonate)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	Michigan Disposal, Inc. Belleville, MI	LF	100 lbs.	6/3/92	NJA1464453
Oakite Cryscoat 147 (Unused product)	Waste Corrosive Solid, n.o.s. (Mono-Sodium Phosphate, Sodium Bisulfate)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	Michigan Disposal, Inc. Belleville, MI	LF	800 lbs.	6/3/92	NJA1464453
Metacote AS-5 (Unused product)	Waste Chemical Process Solid, Ammonium Phospate	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	Michigan Disposal, Inc. Belleville, MI	LF	400 lbs.	6/3/92	NJA1464453
Paraplex G-60 (Unused product)	Waste Chemical Process Liquid Non-DOT/Non-RCRA hazardous	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	Petro-Chemical Processing, Inc. Detroit, MI	FB	55 gals.	6/3/92	NJA1247383
Oakite STC (Unused product)	Waste Alkaline Liquid, n.o.s. (Potassium Hydroxide)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	E.I. Dupont Denemours, Inc. Deepwater, NJ	WWT	120 gals.	6/3/92	NJA1247383
Spray 83 (Unused product)	Waste Compound, Cleaning, Liquid (containing Potassium Hydroxide)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	E.I. Dupont Denemours, Inc. Deepwater, NJ	WWT	55 gals.	6/3/92	NJA1247383
JC-3 (Unused product)	Waste Compound, Cleaning, Liquid (containing Sodium Hydroxide)	Cycle Chem, Inc. Elizabeth, NJ	Environmental Products and Services, Inc.	E.I. Dupont Denemours, Inc. Deepwater, NJ	WWT	55 gals.	6/3/92	NJA1247383
DOPCW (DOP Oil, Cleaner and Water)	RQ Hazardous Waste Liquid, n.o.s. ORM-E NA9189 (Tri-chloroethene, Lead, Toluene, Ethylbenzene, Xylene)	OSCO Treatment Systems Nashville, TN	Freehold Cartage, Inc.	OSCO Treatment Systems Nashville, TN	LF*	3,410 gals	6/24/92	00001

INC – Incineration
LF – Landfill
WWT – Waste Water Treatment
LF* – Landfill after chemical precipitation, neutralization, filtration, and activated sludge processing
FB – Fuel Blending

APPENDIX C
WASTE DISPOSAL SUMMARY TABLE
JARD COMPANY SITE
BENNINGTON, VT

Item/ Waste Stream	DOT Shipping Name	Disposal Company/ Broker	Transporter	Ultimate Disposal Facility	Disposal Method	Volume/ Quantity	Date Shipped	Manifest Doc. No. or Bill of Lading (B/L)
DOPCW (DOP Oil, Cleaner and Water)	RQ Hazardous Waste Liquid, n.o.s. ORM-E NA9189 (Trichloroethene, Lead, Toluene, Ethylbenzene, Xylene)	OSCO Treatment Systems Nashville, TN	Freehold Cartage, Inc.	OSCO Treatment Systems Nashville, TN	LF*	3,425 gals.	6/24/92	00002
TSCA Regulated Tank Waste	Hazardous Waste Liquid, n.o.s. ORM-E NA9189 (Di-octyl Phthalate, Petroleum Oils)	Rollins Environmental Services (TX), Inc., Deer Park, TX	Custom Environmental Transport, Inc.	Rollins Environmental Services (TX), Inc., Deer Park, TX	INC	7,700 kgs	10/13/92	TX00064656
PCB Oil/Solvents	RQ Waste Flammable Liquid, n.o.s. Flammable Liquid (Toluene, Xylene) UN1993	Rollins Environmental Services (TX), Inc., Deer Park, TX	Custom Environmental Transport, Inc.	Rollins Environmental Services (TX), Inc., Deer Park, TX	INC	7,527 kgs	10/13/92	TX00064655
PCB Decon Water	RQ Hazardous Waste Liquid, n.o.s. ORM-E NA9189 (Trichloroethene)	Rollins Environmental Services (TX), Inc., Deer Park, TX	Custom Environmental Transport, Inc.	Rollins Environmental Services (TX), Inc., Deer Park, TX	INC	7,709 kgs	10/19/92	TX00064654
Empty Drums and Containers	Empty Drums and Containers Non-Hazardous/RCRA Non-Hazardous	Cardinal Compliance Corp. Camden, NJ	Blue Diamond Co., Inc.	Cardinal Compliance Corp. Baltimore, MD	Recycle	11,000 lbs	10/20/92	B/L NA
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Polychlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Tonawanda Tank Transport	CWM Chemical Services, Inc., Model City, NY	LF	14,624 kgs.	10/21/92	NYB4347522
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Polychlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Tonawanda Tank Transport	CWM Chemical Services, Inc., Model City, NY	LF	19,768 kgs.	10/21/92	NYB4347549
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Polychlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Tonawanda Tank Transport	CWM Chemical Services, Inc., Model City, NY	LF	15,241 kgs.	10/21/92	NYB4347558
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Polychlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Buffalo Fuel Corp.	CWM Chemical Services, Inc., Model City, NY	LF	19,886 kgs.	10/21/92	NYB4347567
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Polychlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Chemical Waste Management, Inc.	CWM Chemical Services, Inc., Model City, NY	LF	17,563 kgs.	10/21/92	NYB4347576

LF* – Landfill after chemical precipitation, neutralization, filtration, and activated sludge processing
INC – Incineration
NA – Not Available
LF – Landfill

APPENDIX C
WASTE DISPOSAL SUMMARY TABLE
JARD COMPANY SITE
BENNINGTON, VT

Item/ Waste Stream	DOT Shipping Name	Disposal Company/ Broker	Transporter	Ultimate Disposal Facility	Disposal Method	Volume/ Quantity	Date Shipped	Manifest Doc. No. or Bill of Lading (B/L)
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Poly-chlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Buffalo Fuel Corp.	CWM Chemical Services, Inc., Model City, NY	LF	19,496 kgs.	10/21/92	NYB4347585
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Poly-chlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Price Trucking Corp.	CWM Chemical Services, Inc., Model City, NY	LF	20,593 kgs.	10/21/92	NYB4347594
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Poly-chlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Price Trucking Corp.	CWM Chemical Services, Inc., Model City, NY	LF	19,496 kgs.	10/21/92	NYB4347603
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Poly-chlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Price Trucking Corp.	CWM Chemical Services, Inc., Model City, NY	LF	19,423 kgs.	10/21/92	NYB4347612
PCB Contaminated Soil and Debris	RQ Hazardous Substance Solid ORM-E NA9188(Poly-chlorinated Biphenyls, Zinc)	CWM Chemical Services, Inc. Model City, NY	Chemical Waste Management, Inc.	CWM Chemical Services, Inc., Model City, NY	LF	13,000 kgs.	10/21/92	NYB4347621
PCB Solids/Sludges	Waste Flammable Liquid n.o.s. (Toluene, Xylene) Flammable Liquid UN1993	Rollins Environmental Services (TX), Inc., Deer Park, TX	Custom Environmental Transport, Inc.	Rollins Environmental Services (TX), Inc., Deer Park, TX	INC	3,323 kgs.	10/26/92	TX00064653
Empty Drums and Containers	Empty Drums and Containers Non-hazardous\RCRA Non-hazardous	Cardinal Compliance Corp. Camden, NJ	Blue Diamond Co., Inc.	Cardinal Compliance Corp. Baltimore, MD	Recycle	4,000 lbs	10/27/92	B/L C374-A05
Non-TSCA Regulated Tank Waste	Hazardous Waste Liquid, n.o.s. ORM-E NA9189 (D009, D039, D040) RQ	Northeast Environmental Services, Inc., Wampsville, NY	Tri-S Transport, Inc.	River Cement Festus, MO	FB	1,875 gals.	11/11/92	NYB2598093

LF – Landfill
INC – Incineration
NA – Not Available
FB – Fuel Blending

Note: The total quanity pf PCB contaminated soil and debris disposed of at CWM model City, NY was 179,090 kg or 197.41 tons

APPENDIX D

MANIFESTS/BILLS-OF-LADING AND CERTIFICATES OF DISPOSAL

HRS Reference #39

This Shipping Order must be legibly filled in, in Ink, in Indelible Pencil, or in Carbon, and retained by the Agent.

Shipper's No.

Carrier Sleepin Trucking Carrier's No. For USEPA

RECEIVE, subject to the classifications and tariffs in effect on the date of the issue of this Shipping Order,

at Bennington Vt. 1/30 1992 from Dean Taglief

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to A. Shapiro & Sons

(Mail or street address of consignee—For purposes of notification only.)

Destination N. Adams, MA 01247 State County

Delivery Address ★

(★To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route

Delivering Carrier Car or Vehicle Initials No.

No. Packages	Kind of Package, Description of Articles, Special Marks, and Exceptions	*Weight (Sub. to Cor.)	Class or Rate	Check Column
10	Scrap for Recycling (Zinc Scrap.) (30 gallon fibers)	TBW		
	~~Scrap for Recycling (Stainless Steel)~~			
	~~Scrap for Recycling (Paper)~~			
→	Avoid Breathing Dust - Fumes May be Hazardous			

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor.)

If charges are to be prepaid, write or stamp here, "To Be Prepaid."

Received $____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

per

†"The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Uniform Freight Classification."
‡Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.

S. Kim Shipper, Per

Permanent post-office address of shipper.

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

2

6S695 Rediform®

(... SETS) 6P695

Straight Bill of Lading Short Form/Original

Not Negotia

RECEIVED SUBJECT TO THE CLASSIFICATIONS AND TARIFFS IN AFFECT ON THE DATE OF THE ISSUE OF THIS BILL OF LADING.

B/L NO. 50025

SHIPPER	ORIGIN CITY	STATE	ZIP
The JARD Co	BENNINGTON	VT	05201

The property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown) marked, consigned, and destined as indicated below which said company (the word company being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own road or its own water line, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property that every service to be performed hereunder shall be subject to all the conditions not prohibited by law, whether printed or written, herein contained, including the conditions on back hereof which are hereby agreed to by the shipper and accepted for himself and his assigns.

COMPLETE B/L NO. MU BE SHOWN ON FREIGHT INVOICE TO BE PAID

DATE — MONTH: 2 DATE:

CARRIER: YELLOW FREIGHT
SCAC: YFSY
VEHICLE INITIALS & NUMBER:
SEAL NO. (IF TRUCKLOAD OR CARLOAD):

C.O.D. $

CONSIGNEE NAME: P. D. George Co.

DESTINATION:
STREET ADDRESS (NOT P.O. BOX): 5200 North 2nd St.
CITY: St. Louis STATE: MO ZIP: 63166

C.O.D. FEE TO BE PAID BY: CONSIGNEE ☐ SHIPPER ☐

CUSTOMER CHECK: ACCEPTABLE ☐ NOT ACCEPTABLE ☐

Subject to Section 7 of co of applicable bill of lading shipment is to be delivered to signee without recourse on the signor, the consignor shall sig following statement
The carrier shall not make of this shipment without pay freight and all other lawful ch

(Signature of Consign

PALLETS	BOXES	COILS	REELS	HM	DESCRIPTION OF ARTICLES	WT SUBJ TO CORR	CLASS
					WIRE COPPER, COVERED INSULATED OR PLAIN		60
					WIRE COPPER, COVERED INSULATED OR PLAIN (C)		60
					WIRE ALUMINUM, COVERED INSULATED OR PLAIN		60
					WIRE ALUMINUM, COVERED INSULATED OR PLAIN		60
					CABLE ELECTRIC, BRASS BRONZE OR COPPER		60
					ROD, COPPER		60
					EMPTY REELS, STEEL/WOOD, SU, USED		85
				2	1000 Water Borne Insulating Varnish in 55 gal Factory Sealed Drums.	950 drum Numbers 2044207 PT 090	55
					3rd Party Bill To: Essex Group Inc P.O. Box 1216 Columbia City IN 46725		

PIT 198 116544 1

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION

SIGNATURE ______ 2-4 945

TOT TOT TOT TOT

TOTAL WEIGHT: 950

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding ______ per ______

Charges Advanced
$ ______

The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Uniform Freight Classification.

TRANSPORTATION CHARGES ARE TO
______ PREPAID
______ COLLECT
X BILLED
3RD PARTY INDICATE AT LEFT.

CHARGE TO LOCATION NO. 570

FROM LOCATION NO.

TO LOCATION NO.

ESSEX

MAIL INVOICE FOR PREPAID SHIPMENTS, ALONG WITH COPY OF BILL OF LADING TO: ESSEX

SALES ORDER/I.P. NO.'S
Any Questions - Call Jim Brown 219-461-5507
MSDS Sheets Attached (4)
Must Be Picked up By 6 PM 2/4/92

BILL OF LADING

CUST. NO.

DATE 02/04/92

astro CHEMICALS, INC.
64—70 SHAW'S LANE P.O. BOX 2248
SPRINGFIELD, MASS. 01101-2248
TEL. (413) 781-7240

FAX (413) 781-7246

SHIP TO
JARD COMPANY
BOWEN STREET
BENNINGTON, VT

24 HOUR EMERGENCY CONTACT
CHEMTREC 1-800-424-9300

BILL OF LADING NO. 0205

CUSTOMER ORDER NUMBER	REQ./REL. NO.	SHIPPED VIA	SALESMAN	DATE REQUIRED
		ASTRO (TAILGATE	14	02/05/92

UNITS ORDERED	UNITS SHIPPED	UNITS B.O.	H.M.	PACKAGE	DESCRIPTION	QUANTITY LBS/GALS NET	QUANTITY LBS/GALS GROSS
3	3		X	55GDRUM	METHYL ALCOHOL FLAMMABLE LIQUID UN 1230 METHANOL		1300 LBS
1	1		X	600#DRUM	1,1,1, TRICHLOROETHANE ORM- A UN 2831		640 LBS
1	1		X	140#DEL	HYDROCHLORIC ACID CORROSIVE MATERIAL UN 1789 HYDROCHLORIC ACID 20 BAUME		160 LBS
					P/U DRIVE NEED A TAILGATE		

THANK YOU FOR THE ORDER. WE APPRECIATE YOUR BUSINESS.

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATION OF THE DEPARTMENT OF TRANSPORTATION.

RECEIVED ABOVE MERCHANDISE IN GOOD CONDITION

ACCEPTED BY [signature] As agent for USEPA

This Shipping Order

Only filled in, in Ink, in Indelible Pencil, or in Carbon, and retained by the Agent

Shipper's No. _____

WEST CENTRAL ENVIRONMENTAL CORP
(Name of Carrier)

Carrier's No. 4A-106

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of the Bill of Lading,

at BENNINGTON, Vt. March 17 1992 From JARD CORP.

the property described below, in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classification in effect on the date thereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to MODERN LANDFILL INC.

(Mail or street address at consignee—For purposes of notification only.)

Destination Model City State NY. Zip 14107 County _____ Delivery Address ★ _____

★ To be filled in only when shipper desires and governing tariffs provide for delivery thereof.

Route _____

Delivering Carrier SAME Car or Vehicle Initials _____ No. 053

No. Packages	Kind of Package, Description of Articles, Special Marks, and Exceptions	*WEIGHT (Subject to Correction)	Class or Rate	Check Column
1	NON-HAZARDOUS NON-PCB TYPE CAPACITORS & DEBRIS	APPROX. 30,000 lbs		

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

If charges are to be prepaid, write or stamp here: "To be Prepaid."

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____

(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$ _____

† Shipper's imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission.

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

† The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of the Consolidated Freight Classification.

JARD CORP Shipper, Per Dean Tagliaferro

Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

Permanent post-office address of shipper, BENNINGTON, Vt

EPA 2

WilsonJones • Carbonless • MADE IN USA
44-301 Triplicate

This Shipping Order must be legibly filled in, in ink, in indelible Pencil, or in Carbon, and retained by the Agent

Shipper's No. _____

WEST CENTRAL ENVIRONMENTAL CORP

(Name of Carrier)

Carrier's No. 4A-106

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of the Bill of Lading,

at BENNINGTON, Vt. MARCH 17 19 92 From JARD CORP.

the property described below, in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its own route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classification in effect on the date thereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to MODERN LANDFILL INC.

(Mail or street address at consignee—For purposes of notification only.)

Destination Model City State N.Y. Zip 14107 County _____ Delivery Address ★ _____

★ To be filled in only when shipper desires and governing tariffs provide for delivery thereof.

Route _____

Delivering Carrier SAME Car or Vehicle Initials _____ No. 052

No. Packages	Kind of Package, Description of Articles, Special Marks, and Exceptions	*WEIGHT (Subject to Correction)	Class or Rate	Check Column
1	NON-HAZARDOUS NON-PCB TYPE CAPACITORS & DEBRIS	APPROX 30000 LBS		

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

If charges are to be prepaid, write or stamp here; "To be Prepaid."

Received $ _____ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per _____
(The signature here acknowledges only the amount prepaid.)

Charges Advanced:

$ _____

† Shipper's Imprint in lieu of stamp; not a part of Bill of Lading approved by the Interstate Commerce Commission.

* If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____

† The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of the Consolidated Freight Classification.

JARD CORP Shipper, Per Dean Tagliaferro Agent must detach and retain this Shipping Order and must sign the Original Bill of Lading.

Permanent post-office address of shipper, BENNINGTON, Vt.

EPA

2

WilsonJones • Carbonless • MADE IN USA
44-301 Triplicate

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

61726
MAG 583215

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741
Manifest Document No.: 05442
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201

4. Generator's Phone (802) 447-9650

A. State Manifest Document Number: MA G583215
B. State Gen. ID: BOWEN RD.
C. State Trans. ID: BENNINGTON VT — MA 972708

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC.
6. US EPA ID Number: MAD000604447
D. Transporter's Phone 508 683-1002

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Trans. ID
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE, MA
10. US EPA ID Number: MAD000604447
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone 508 683-1002

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ WASTE FLAMMABLE LIQUID, n.o.s. (TOLUENE, METHYL ETHYL KETONE) FLAMMABLE LIQUID UN1993 (D001)(F005)	001	DM	00200	P	D001F005 D035F003
b. RQ WASTE FLAMMABLE LIQUID, n.o.s. (METHANOL, METHYLENE CHLORIDE) FLAMMABLE LIQUID UN1993 (D001)(D018)	001	DM	00200	P	D001D018 F002F003
c. WASTE FLAMMABLE LIQUID, n.o.s. (PYRIDINE) FLAMMABLE LIQUID UN1993	001	DF	00020	P	D001F005 D038
d. RQ WASTE FLAMMABLE LIQUID, n.o.s. (XYLENE, METHYL ETHYL KETONE) FLAMMABLE LIQUID UN1993 (D001)(F003)	001	DM	00200	P	D001F003 F005D035

GENERATOR

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. L5842-02 LABPACK
b. L5842-03 LABPACK
c. L5842-30 LABPACK
d. L5842-04 LABPACK

K. Handling Codes for Wastes Listed Above
a. S01
b. S01
c. S01
d. S01

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.)
Cont. d. – Arsenal
USEPA Superfund Cleanup. Vt. State hazardous waste tax waived.
For additional information on labpacks, see attached container content sheets.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

Printed/Typed Name: Dean Tagliaferro As agent for USEPA
Signature: Dean Tagliaferro
Date: Month 10 Day 31 Year 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald Bozeman
Signature: Donald Bozeman
Date: Month 10 Day 32 Year 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GUILFOYLE
Signature: Dave Guilfoyle
Date: Month 10 Day 35 Year 92

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY>3: FACILITY MAILS TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

MAG 583216

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VTD048141741 Manifest Document No. 05842
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201
4. Generator's Phone (802) 447-9650

A. State Manifest Document Number **MA G 583216**
B. State Gen. ID BOWEN RD. BENNINGTON VT
C. State Trans. ID MA 972708
D. Transporter's Phone 508-683-1002
E. State Trans. ID
F. Transporter's Phone ( )
G. State Facility's ID NOT REQUIRED
H. Facility's Phone 508 683-1002

5. Transporter 1 Company Name LAIDLAW ENV. SVCS. (NORTH EAST), INC.
6. US EPA ID Number MAD000604447
7. Transporter 2 Company Name
8. US EPA ID Number
9. Designated Facility Name and Site Address
LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE, MA
10. US EPA ID Number MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
FLAMMABLE SOLID, n.o.s. (IRON POWDER) FLAMMABLE SOLID UN1325	001	DF	00020	P	MA99
RQ WASTE FLAMMABLE LIQUID, n.o.s. (PETROLEUM DISTILLATE, TOLUENE) FLAMMABLE LIQUID UN1993 (D001)(D008)	001	DM	00200	P	D001D008 F003F005
WASTE FLAMMABLE LIQUID, CORROSIVE, n.o.s. (PYRIDINE, ACETIC ANHYDRIDE) FLAMMABLE LIQUID UN2924	001	DF	00020	P	D001D002 D038
WASTE FLAMMABLE LIQUID, n.o.s. (XYENE, TOLUENE) FLAMMABLE LIQUID UN1993	001	DM	00200	P	D001F002 F003F005

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. L5842-31 LABPACK
b. L5842-05 LABPACK
c. L5842-32 LABPACK
d. L5842-33 LABPACK

K. Handling Codes for Wastes Listed Above
a. S01 b. S01 c. S01 d. S01

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.) D007 D008
Cont driver R Aserault
US EPA Superfund Clean-up: Vt State hazardous waste tax waived
~~For additional information on labpacks, see attached container content sheets.~~

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

Printed/Typed Name: Dean Tagliaferro As agent for US EPA — Signature: Dean Tagliaferro — Date: 03/24/92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald Bozeman — Signature: Donald Bozeman — Date: 03/24/92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GUILFOYLE — Signature: Dave Guilfoyle — Date: 03/26/92

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 3: FACILITY MAILS TO GENERATOR

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

61726
MAC 583217

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD043141741 | Manifest Document No.: 05642
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201
4. Generator's Phone (802) 447-9650

A. State Manifest Document Number: MA G583217
B. State Gen. ID: BOWEN RD. BENNINGTON VT
C. State Trans. ID: MA 972708
D. Transporter's Phone: 508-683-1002
E. State Trans. ID:
F. Transporter's Phone ( )
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone: 508 683-1002

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC. | 6. US EPA ID Number: MAD000604447
7. Transporter 2 Company Name | 8. US EPA ID Number

9. Designated Facility Name and Site Address
LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE MA
10. US EPA ID Number: MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ WASTE FLAMMABLE LIQUID, n.o.s. (TOLUENE,XYLENE) FLAMMABLE LIQUID UN1993 (D001)(F003)	001	DM	00200	P	D001F003 F005D035
b. WASTE FLAMMABLE LIQUID, n.o.s. (PETROLEUM DISTILLATES) FLAMMABLE LIQUID UN1993	001	DF	00100	P	D001
c. RQ WASTE COMBUSTIBLE LIQUID, n.o.s. (PETROLEUM DISTILLATES) COMBUSTIBLE LIQUID NA1993 (D001)	001	DM	00200	P	D001
d. RQ WASTE FLAMMABLE LIQUID, n.o.s. (PETROLEUM DISTILLATE,XYLENE) FLAMMABLE LIQUID UN1993 (D001)(D008)	001	DM	00200	P	D001D008 F003F005

J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code.)
a. L5842-07 LABPACK
b. L5842-AERO-35
c. L5842-08 LABPACK
d. L5842-09 LABPACK

K. Handling Codes for Wastes Listed Above
a. S 0 1
b. S 0 1
c. S 0 1
d. S 0 1

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.)
US EPA Superfund Clean-up. Vermont State, hazardous waste tax is waived.
For additional information on labpack, see attached container contents sheets.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

GENERATOR

Printed/Typed Name: Dean Tagliaferro As agent for USEPA
Signature: Dean Tagliaferro
Date: Month 03 Day 24 Year 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald Bozeman
Signature: Donald Bozeman
Date: Month 03 Day 24 Year 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GUILFOYLE
Signature: Dave Guilfoyle
Date: Month 03 Day 24 Year 92

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY>3: FACILITY MAILS TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

MAC 583218

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD049141741 | Manifest Document No.: 05342 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201
4. Generator's Phone (802) 447-3650

A. State Manifest Document Number: MA G 583218
B. State Gen. ID: BOWEN RD. BENNINGTON VT
C. State Trans. ID: MA 972708
D. Transporter's Phone: 508 683-1002
E. State Trans. ID:
F. Transporter's Phone ( )
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone: 508 683-1002

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC. | 6. US EPA ID Number: MAD000604447
7. Transporter 2 Company Name | 8. US EPA ID Number

9. Designated Facility Name and Site Address
LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE, MA
10. US EPA ID Number: MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
RQ WASTE ALKALINE LIQUID,n.o.s. (AMMONIUM HYDROXIDE) CORROSIVE MATERIAL NA1719 (D002)	001	DM	00200	P	D002
RQ WASTE CORROSIVE LIQUID,POISONOUS, nos (PHENOL,METHYLENE CHLORIDE) CORROSIVE MATERIAL UN2922 (D002)(F002)	001	DF	00100	P	D002F002
RQ HAZARDOUS SUBSTANCE SOLID,n.o.s. (CUPRIC) ORM-E NA9188 (MA99)	001	DF	00020	P	MA99
RQ WASTE OXIDIZER,CORROSIVE LIQUID, nos (SILVER NITRATE,NITRIC ACID) OXIDIZER NA9193 (D001)(D002)	001	DF	00020	P	D001D002 D011

J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code.)
a. L5842-11) LABPACK
c. L-5842-12) LABPACK
b. L5842-13
d. L-5842-14 LABPACK

K. Handling Codes for Wastes Listed Above
a. S 0 1 | c. S 0 1
b. S 0 1 | d. S 0 1

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.)
US EPA Superfund Clean-up Vt. State hazardous waste tax waived.
For additional information on labpacks, see attached container contents sheets.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
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IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

GENERATOR — Printed/Typed Name: Dean Tagliaferro As agent for USEPA | Signature: Dean Tagliaferro | Date: Month 03 Day 24 Year 92

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: Donald W Bozeman | Signature: Donald W Bozeman | Date: Month 03 Day 24 Year 92
18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name | Signature | Date

FACILITY
19. Discrepancy Indication Space
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GUILFOYLE | Signature: Dave Guilfoyle | Date: Month 03 Day 24 Year 92

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY>3: FACILITY MAILS TO GENERATOR

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

61726
MAC 583219

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741 | Manifest Document No.: 05842
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201
4. Generator's Phone (802) 447-3650

A. State Manifest Document Number: MA G583219
B. State Gen. ID: BOWEN RD.
C. State Trans. ID: BENNINGTON VT MA 972708
D. Transporter's Phone: 508 683-1002
E. State Trans. ID:
F. Transporter's Phone ( )
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone: 508 683-1002

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC. | 6. US EPA ID Number: MAD000604447
7. Transporter 2 Company Name | 8. US EPA ID Number
9. Designated Facility Name and Site Address: LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE MA | 10. US EPA ID Number: MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. WASTE ACETIC ANHYDRIDE, CORROSIVE MATERIAL UN1715	001	DF	00020	P	D002
b. WASTE ALKALINE LIQUID, n.o.s. (SODIUM HYDROXIDE) CORROSIVE MATERIAL NA1719	001	DF	00100	P	D002
c. RQ WASTE POISON B SOLID, n.o.s. (MERCURY) POISON B UN2811 (D009)	001	DF	00040	P	D009
d. SODIUM HYDROXIDE, DRY SOLID, CORROSIVE MATERIAL UN1823	001	DM	00400	P	MA99VT11

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. L5842-15 | c. MERCURY/SPEEDI
b. L5842-16 LABPACK | d. L5842-LES-17 SODIUM HYDROXIDE L5842-LES-19

K. Handling Codes for Wastes Listed Above
a. S 0 1 | c. S 0 1
b. S 0 1 | d. S 0 1

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Cont. Id (cont.)
US. EPA Superfund Clean-up. VT. hazardous Waste tax has been waived
for additional information on labpacks, see attached container contents sheets.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
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IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

GENERATOR — Printed/Typed Name: Dean Tagliaferro As agent for USEPA | Signature: Dean Tagliaferro | Date: Month 03 Day 24 Year 92

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: Donald Bozeman | Signature: Donald Bozema | Date: Month 03 Day 24 Year 92
18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name | Signature | Date: Month Day Year

FACILITY
19. Discrepancy Indication Space
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name: DAVE GUILFOYLE | Signature: Dave Guilfoyle | Date: Month 03 Day 24 Year 92

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

COPY>3: FACILITY MAILS TO GENERATOR

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY>3: FACILITY MAILS TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

(37) MAG 583220 61726

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VTD048141741 — Manifest Document No. 05842
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201
4. Generator's Phone (802) 447-9650

A. State Manifest Document Number: MA G 583220
B. State Gen. ID: BOWEN RD. BENNINGTON VT
C. State Trans. ID: MA 972708
D. Transporter's Phone: 508 683-1002
E. State Trans. ID
F. Transporter's Phone ( )
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone: 508 683-1002

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC.
6. US EPA ID Number: MAD000604447
7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE MA
10. US EPA ID Number: MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE OXIDIZER, CORROSIVE LIQUID, n.o.s. (PERCHLORIC ACID, ACETIC ACID) OXIDIZER NA9193	001	DF	00020	P	D001 D002
b. RQ WASTE ACID LIQUID, n.o.s. (SULFURIC ACID, CHROMIC ACID) CORROSIVE MATERIAL NA1760 (D002)(D007)	001	DF	00100	P	D002 D007 D008
c. WASTE FLAMMABLE LIQUID, POISONOUS, n.o.s. (XYLENE, CHLORPYRIFOS) FLAMMABLE LIQUID UN1993	001	DF	00020	P	D001
d. WASTE FLAMMABLE LIQUID, n.o.s. (METHYL ISOAMYL KETONE) FLAMMABLE LIQUID UN1993	001	DM	00500	P	D001

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. L5842-19 LABPACK
b. L5842-20 LABPACK
c. L5842-PEST-21
d. METHYL ISOAMYL KETONE L5842-LES-22

K. Handling Codes for Wastes Listed Above
a. S01 b. S01 c. S01 d. S01

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.) Cont. driver R. Arsenault
US EPA Superfund cleanup. Vt State hazardous waste tax waived.
For additional information on labpacks, see attached container content sheets.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

Printed/Typed Name: Dean Tagliaferro As agent for USEPA — Signature: Dean Tagliaferro — Date: 03 24 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald Bozeman — Signature: Donald Bozeman — Date: 03 24 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GUILFOYLE — Signature: Dave Guilfoyle — Date: 03 24 92

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 3: FACILITY MAILS TO GENERATOR

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

61726
MAG 583221

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741
Manifest Document No.: 05842
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address:
US EPA
BOWEN RD.
BENNINGTON VT 05201

4. Generator's Phone (802) 447-9650

A. State Manifest Document Number: MA G583221
B. State Gen. ID: BOWEN RD. BENNINGTON VT

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC.
6. US EPA ID Number: MAD000604447

C. State Trans. ID: MA 972708
D. Transporter's Phone (508) 683-1002

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Trans. ID
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address:
LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE MA

10. US EPA ID Number: MAD000604447

G. State Facility's ID: NOT REQUIRED
H. Facility's Phone (508) 683-1002

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE TITANIUM TETRACHLORIDE CORROSIVE MATERIAL UN1838	001	DF	00020	P	D002
b. RQ WASTE FLAMMABLE LIQUID, n.o.s. (PETROLEUM DISTILLATES) FLAMMABLE LIQUID UN1993 (D001)	001	DF	00100	P	D001
c. RQ WASTE FLAMMABLE LIQUID, n.o.s. (XYLENE,TOLUENE) FLAMMABLE LIQUID UN1993 (D001)(F003)	001	DF	00100	P	D001F003 F005D035
d. WASTE FLAMMABLE LIQUID,CORROSIVE,n.o.s. (POTASSIUM HYDROXIDE,METHANOL) FLAMMABLE LIQUID UN2924	001	DF	00100	P	D001D002

J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code.)
a. L5842-23 LABPACK
b. L5842-24 LABPACK
c. L5842-25 LABPACK
d. L5842-26 LABPACK

K. Handling Codes for Wastes Listed Above
a. S01 b. S01 c. S01 d. S01

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.) Cont. drive K. Mscraw
Vt US EPA Superfund clean-up. Vt. State hazardous waste tax waived.
For additional information on labpacks, see attached container content sheets.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

Printed/Typed Name: Dean Tagliaferro As agent for US EPA
Signature: Dean Tagliaferro
Date: Month 10 Day 31 Year 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald Bozeman
Signature: Donald Bozeman
Date: Month 10 Day 31 Year 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GUILFOYLE
Signature: Dave Guilfoyle
Date: Month 10 Day 31 Year 92

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

Approved OMB No. 2050-0039. Expires 9/30/92
Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY>3: FACILITY MAILS TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

61736
MAC 583222

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741 | Manifest Document No.: 05842
2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201
4. Generator's Phone (802) 447-9650

A. State Manifest Document Number: MA G 583222
B. State Gen. ID: BOWEN RD.
C. State Trans. ID: BENNINGTON VT MA 972708
D. Transporter's Phone: 508 683-1002
E. State Trans. ID:
F. Transporter's Phone ( )
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone: 508 683-1002

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC. | 6. US EPA ID Number: MAD000604447
7. Transporter 2 Company Name | 8. US EPA ID Number
9. Designated Facility Name and Site Address: LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE MA | 10. US EPA ID Number: MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE FLAMMABLE LIQUID, n.o.s. (ACETONE, CHLOROBENZENE) FLAMMABLE LIQUID UN1993	001	DF	00100	P	D001 F003 D021
b. NON-REGULATED MATERIAL	001	DM	00200	P	MA99
c. NON-REGULATED MATERIAL	001	DF	00100	P	MA99
d. NON-REGULATED MATERIAL	001	DF	00100	P	MA99

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. L5842-27 LABPACK | c. L5842-28 LABPACK
b. L5842-01 LABPACK | d. L5842-29 LABPACK

K. Handling Codes for Wastes Listed Above
a. S 0 1 | c. S 0 1
b. S 0 1 | d. S 0 1

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.)
US EPA Superfund clean-up. VT hazardous waste tax has been waived.
For additional information on labpacks, see attached container content sheets.

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IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

GENERATOR — Printed/Typed Name: Dean Tagliaferro As agent for USEPA | Signature: Dean Tagliaferro | Date: Month 03 Day 24 Year 92

TRANSPORTER
17. Transporter 1 Acknowledgement of Receipt of Materials — Printed/Typed Name: Donald W Bozeman | Signature: Donald Bozeman | Date: Month 03 Day 24 Year 92
18. Transporter 2 Acknowledgement of Receipt of Materials — Printed/Typed Name | Signature | Date: Month Day Year

FACILITY
19. Discrepancy Indication Space
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GULLFOYLE | Signature: Dave Gullfoyle | Date: Month 03 Day 24 Year 92

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street Boston, Massachusetts 02108

DEP

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VTD048141741 — Manifest Document No. 05842
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201

4. Generator's Phone (802) 447-3650

A. State Manifest Document Number: MA G583223
B. State Gen. ID: BOWEN RD. BENNINGTON VT
C. State Trans. ID: MA 972708
D. Transporter's Phone 508 683-1002
E. State Trans. ID
F. Transporter's Phone ( )
G. State Facility's ID NOT REQUIRED
H. Facility's Phone 508 683-1002

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC.
6. US EPA ID Number: MAD000604447

7. Transporter 2 Company Name
8. US EPA ID Number

9. Designated Facility Name and Site Address
LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE MA

10. US EPA ID Number: MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. NON-REGULATED MATERIAL	001	DM	00208	P	MA99
b. NON-REGULATED MATERIAL	001	DM	00400	P	MA99
c. NON-REGULATED MATERIAL	001	DM	00400	P	MA99
d. NON-REGULATED MATERIAL	001	DM	00200	P	MA99

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. L5842-06) LABPACK
b. BHI L5842-LES-36)
c. CLEANING COMPOUND IRON PHOSPHATIZER L5842-LES-37)
d. L5842-10) LABPACK

K. Handling Codes for Wastes Listed Above
a. S01 b. S01 c. S01 d. S01

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) Id (cont.) cont. driver K. Arsenault
U.S. EPA superfund clean-up. Vt state hazardous waste tax has been waived.
~~For additional information on labpacks, see attached container content sheets.~~

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EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

Printed/Typed Name: Dean Tagliaferro As agent for US EPA — Signature: Dean Tagliaferro — Date: Month 10 Day 24 Year 92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Donald Bozeman — Signature: Donald Bozeman — Date: Month 10 Day 24 Year 92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Date: Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: DAVE GUILFOYLE — Signature: Dave Guilfoyle — Date: Month 10 Day 24 Year 92

IN CASE OF EMERGENCY OR SPILL, immediately call the National Response Center (800) 424-8802.

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 3: FACILITY MAILS TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE
One Winter Street | Boston, Massachusetts 02108

MAC 583224

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741 | Manifest Document No.: 05342 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
US EPA
BOWEN RD.
BENNINGTON VT 05201
4. Generator's Phone (802)447-9650

A. State Manifest Document Number: MA G583224
B. State Gen. ID: BOWEN RD. BENNINGTON VT
C. State Trans. ID: MA 972708
D. Transporter's Phone: (508 683-1002
E. State Trans. ID:
F. Transporter's Phone ( )
G. State Facility's ID: NOT REQUIRED
H. Facility's Phone: 508 683-1002

5. Transporter 1 Company Name: LAIDLAW ENV. SVCS. (NORTH EAST), INC. | 6. US EPA ID Number: MAD000604447
7. Transporter 2 Company Name | 8. US EPA ID Number
9. Designated Facility Name and Site Address: LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC.
300 CANAL STREET
LAWRENCE MA | 10. US EPA ID Number: MAD000604447

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. NON-REGULATED MATERIAL	001	DM	00400	P	MA99VT03
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above (include physical state and hazard code.)
a. MOSSY ZNIC L5842-LES-34 | c.
b. | d.

K. Handling Codes for Wastes Listed Above
a. S 0 1 | c.
b. | d.

15. Special Handling Instructions and Additional Information
Ia (cont.) Ib (cont.) Ic (cont.) cont driver R. Fiasenau Id (cont.)
U.S. EPA Superfund Clean-up VT hazardous waste tax is waived.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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IN EMERGENCY SITUATION CONTACT LAIDLAW (NORTH EAST) 508-683-1002

GENERATOR

Printed/Typed Name	Signature	Date (Month Day Year)
Dean Tagliaferro As agent for US EPA	Dean Tagliaferro	10 31 91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
Donald Bozeman	Donald Bozeman	10 31 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date (Month Day Year)
DAVE GUILFOYLE	Dave Guilfoyle	10 31 91

Form Approved OMB No. 2050-0039. Expires 9/30/92
EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

MA G583224 COPY>3: FACILITY MAILS TO GENERATOR

LAIDLAW ENVIRONMENTAL SERVICES

Service Center

HAZ TRAC (TM)

Complete tracking of each container of hazardous waste from the point of generation to the final disposal site

Generator's Name	Bar Code #	P/U Date	Manifest Number	# of Dru
55078 US EPA BOWEN RD. BENNINGTON, VT 05201	61726	3/24/92	MAG583215-224	37

Drum #	Laboratory Description	Billing Code/ Bill Back #	Approval/ EPA Numbers	Ship Date/Disposal Si Treatment Method
1	L5842-28	LABPACK-PW	A1 584228 MA99	3/30/92 GSX SERVICES OF SC, SECURE CHEMICAL LANDF
2	L5842-29	LABPACK-PW	B1 584229 MA99	3/30/92 GSX SERVICES OF SC, SECURE CHEMICAL LANDF
3	L5842-20	HLP-LIQINORG	S 584220 D002 D007 D008	4/01/92 HERITAGE ENVIRONMENTAL ROTARY KILN INCINERATO Indianapolis, IN
4	L5842-16	LABPACK-ENS	O 584216 D002	4/02/92 ENSCO ROTARY KILN INCINERA
5	L5842-13	LABPACK-ENS	K1 584213 D002 F002	4/02/92 ENSCO ROTARY KILN INCINERA
6	HG/DEBRIS	PWSOLID	P 5842 17 D009	3/25/92 GSX SERVICES OF SC, SECURE CHEMICAL LANDFI
7	L5842-23	LABPACK-ENS	V 584223 D002	4/02/92 ENSCO ROTARY KILN INCINERATO

Laidlaw Environmental Services (North East), Inc.
221 Sutton Street North Andover, Massachusetts 01845 Phone 508.683.1002 Fax 508.794.9665

8	L5842-15	LABPACK-ENS	N 584215 D002	4/02/92 ENSCO ROTARY KILN INCINERATO
9	L5842-12	LABPACK-ENS	L 584212 MA99	4/02/92 ENSCO ROTARY KILN INCINERATO
10	L5842-19	LABPACK-ENS	R 584219 D001 D002	4/15/92 HERITAGE ENVIRONMENTAL Neutralization
11	L5842-14	HLP-SSINORG	M 584214 D001 D002 D011	4/01/92 HERITAGE ENVIRONMENTAL Neutralization
12	NAOH	PWVS	Q 5842 18 VT11 MA99	3/25/92 GSX SERVICES OF SC, IN SECURE CHEMICAL LANDFI
13	L5842-06	LABPACK-PW	F 58426 VT11 MA99	3/30/92 GSX SERVICES OF SC, IN SECURE CHEMICAL LANDFI
14	L5842-01	LABPACK-PW	A 58421 VT11 MA99	3/30/92 GSX SERVICES OF SC, IN SECURE CHEMICAL LANDFI
15	L5842-11	HLP-SSINORG	K 584211 D002	4/01/92 HERITAGE ENVIRONMENTAL Neutralization
16	BHT	PWVS	H1 5842 36 MA99	3/25/92 GSX SERVICES OF SC, IN SECURE CHEMICAL LANDFI
17	CLEANING CNMP	PWVS	I1 5842 37 MA99	3/25/92 GSX SERVICES OF SC, IN SECURE CHEMICAL LANDFI
18	L5842-10	LABPACK-PW	J 584210 MA99	3/30/92 GSX SERVICES OF SC, IN SECURE CHEMICAL LANDFI
19	L5842-08	HLP-SSORG	H 58428 D001	4/01/92 HERITAGE ENVIRONMENTAL ROTARY KILN INCINERATO

20	MOSSY ZN, PW FOUND VS.	PWVS	J1 5842 34 VT13 MA99	3/25/92 GSX SERVICES OF SC, SECURE CHEMICAL LANDF
21	L5842-09	LP-REIDIN	I 58429 D001 D008 F003 F005	4/02/92 LAIDLAW ENV. SVC.(TS ROTARY KILN INCINERATO
22	L5842-33	HLP-SSORG	F1 584233 D001 D007 D008 F002 F003F005	4/01/92 HERITAGE ENVIRONMENTAL ROTARY KILN INCINERA
23	L5842-03	LP-REIDIN	C 58423 D001 D018 F002 F003 F005	4/02/92 LAIDLAW ENV. SVC.(TS), ROTARY KILN INCINERATO
24	L5842-02	HLP-LIQORG	B 58422 D001 D035 F003 F005	4/01/92 HERITAGE ENVIRONMENTAL Neutralization
25	L5842-05	LP-REIDIN	E 58425 D001 D008 F003 F005	4/02/92 LAIDLAW ENV. SVC.(TS), ROTARY KILN INCINERA C Roebuck, SC
26	L5842-04	LP-REIDIN	D 58424 D001 D035 F003 F005	4/02/92 LAIDLAW ENV. SVC.(TS , ROTARY KILN INCINERATO
27	L5842-07	HLP-SSORG	G 58427 D001 D035 F003 F005	4/01/92 HERITAGE ENVIRONMENTAL Neutralization
28	L5842-27	LABPACK-ENS	Z 584227 F003 D001 D021	4/02/92 ENSCO ROTARY KILN INCINERA_D
29	L5842-24	LABPACK-ENS	W 584224 D001	4/02/92 ENSCO ROTARY KILN INCINERATO

30	L5842-25	LABPACK-ENS	X 584225 D001 D035 F003 F005	4/02/92 ENSCO ROTARY KILN INCINERAT
31	AEROSOL CANS	AEROSOL	G1 584235 D001	3/31/92 ENSCO ROTARY KILN INCINERAT
32	L5842-26	LABPACK-ENS	Y 584226 D001 D002	4/02/92 ENSCO ROTARY KILN INCINERAT
33	HIGH BTU SOLVENT L5842-22 (MIAK)	FLAMIX	U 5842 22 D001	3/25/92 KEYSTONE CEMENT ROTARY KILN INCINERAT
34	L5842-30	HLP-LIQORG	C1 584230 D001 D038 F005	4/01/92 HERITAGE ENVIRONMENTA ROTARY KILN INCINERAT
35	L5842-32	LABPACK-ENS	E1 584232 D001 D002 D038	4/02/92 ENSCO ROTARY KILN INCINERAT
36	L5842-21	PESTPACK	T 584221 D001	4/02/92 ENSCO ROTARY KILN INCINERAT
37	L5842-31	LABPACK-ENS	D1 584231 MA99	4/02/92 ENSCO ROTARY KILN INCINERAT

VHW-001 (REV. 9/86)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-3…

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741 — Manifest Document No.: 00006
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: U.S. E.P.A. Region 1 Attn: Dean Tagliaferro
60 Westview Street
Lexington, MA 02173
4. Generator's Phone (617) 860-4625

A. State Manifest Document Number: NJA 1464454
B. State Generator's ID: 126 Bowen Road, Bennington, VT 05201

5. Transporter 1 Company Name: Environmental Products & Services Inc
6. US EPA ID Number: NYD980761191
C. State Trans. ID: NYSDEC 7A010
D. Transporter's Phone (315) 471-0503

7. Transporter 2 Company Name: Environmental Products & Services Inc
8. US EPA ID Number: NYD980761191
E. State Trans. ID: NJDEPS 50060
Tractor: 20433 Trailer: 20440
F. Transporter's Phone (315) 471-0503

9. Designated Facility Name and Site Address: Cycle Chem, Inc.
217 South First Street
Elizabeth, NJ 07206
10. US EPA ID Number: NJD002200046
G. State Facility's ID:
H. Facility's Phone (908) 355-5800

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Corrosive Liquid, n.o.s. (dimethylaminoethanol) Corrosive Material UN1760 (D001)	X	001	DM	00005	G	D002
b. Waste Chemical Process Solid (2-chloroanthraquinone) non-DOT/non-RCRA		001	DM	00055	G	X921
c.						
d.						

J. Additional Descriptions for Materials Listed Above
a. L I dimethylaminoethanol 99% inert ingredients 1%
b. S 2-chloroanthraquinone-100%
c.
d.

K. Handling Codes for Wastes Listed Above
a. S01
b. S01
c.
d.

15. Special Handling Instructions and Additional Information
EPS Job#32A6572 PO#44013 a. 343224-F024 b. 343224-BF002-02 a. NY=B b. NY=L
a. ERG#60
PLATE# NYCG49 Transporter#1
EMERGENCY RESPONSE # 315-471-0503-Mark Hansen
USEPA Superfund Site VT DEC trans. fee waived

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name: Dean Tagliaferro As agent for USEPA — Signature: Dean Tagliaferro — Month Day Year: 10 03 9…

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MICHAEL P DALEY — Signature: [signature] — Month Day Year: … 3 9…

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Mark Watkins — Signature: [signature] — Month Day Year: [illegible]

FACILITY

19. Discrepancy Indication Space: EI DECAL # 50443

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] — Signature: [signature] — Month Day Year: [illegible]

HRS Reference #39

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

3 — TSD MAIL TO - GENERATOR

CYCLE CHEM
RECYCLING TREATMENT & DISPOSAL OF HAZARDOUS WASTE

7/21/92

US EPA REGION 1
60 WESTVIEW STREET
LEXINGTON MA 02173-0000

EPSALB
126 BOWEN ROAD
BENNINGTON VT 05201-000

RE: Certificate of Disposal

Dear Sir/Madam:

This letter is to certify that Cycle Chem, Inc. EPA ID No. NJD002200046 has accepted and processed the following shipments.

This acceptance is in accordance with all State and Federal Regulations and with the conditions set forth in Cycle Chem's Hazardous Waste Facility Permit.

PROD CODE	SEQ #	MANIFEST IN	DATE IN/ DATE OUT	MANIFEST OUT	SENT	DISPOSAL SITE AND METHOD
BF002	02	NJA1464454	6/05/92 6/23/92	MI2710463	1 DM	MICHIGAN DISPOSAL INC. STABILIZE AND LANDFILL
F024	00	NJA1464454	6/05/92 7/10/92	AR560665	1 DM	ENSCO INC. INCINERATE

If there are any further questions about the disposal of your waste, please do not hesitate to call.

Sincerely,

Gary Hoadley Sr

Gary Hoadley
General Manager

RECEIVED
JUL 27 1992
ENVIRONMENTAL OIL, INC.
OF ALBANY

VHW-001 (REV. 9/86)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. V T D 0 4 8 1 4 1 7 4 1 Manifest Document No. 0 0 0 0 5

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
U.S. E.P.A. - Region I   Attn: Dean Tagliaferro
60 Westview Street
Lexington, MA 02173

4. Generator's Phone (617) 860-4625

A. State Manifest Document Number NJA 1464453

B. State Generator's ID
126 Bowen Road
Bennington, VT 05201

5. Transporter 1 Company Name: Environmental Products & Services Inc

6. US EPA ID Number: N Y D 9 8 0 7 6 1 1 9 1

C. State Trans. ID NYSDEC 7A0110

D. Transporter's Phone (315) 471-0503

7. Transporter 2 Company Name: Environmental Products & Services Inc

8. US EPA ID Number: N Y D 9 8 0 7 6 1 1 9 1

E. State Trans. ID NJDEPS 50060

Tractor:20433 Trailer:20440

F. Transporter's Phone (315 471-0503

9. Designated Facility Name and Site Address
Cycle Chem, Inc.
217 South First Street
Elizabeth, NJ 07206

10. US EPA ID Number: N J D 0 0 2 2 0 0 0 4 6

G. State Facility's ID

H. Facility's Phone (908) 355-5800

	HM	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	X	Waste Alkaline Liquid, n.o.s. (sodium silicate/2-butoxyethanol) Corrosive Material NA1719(D002)	001	BF	00055	G	D010
b.	X	Waste Corrosive Solid, n.o.s. (sodium hydroxide/sodium carbonate) Corrosive Material UN1759(D002)	001	DF	00100	P	D002
c.	X	Waste Corrosive Solid, n.o.s. (mono-sodium phosphate/sodium bisulfate) (D002) Corrosive Material UN1759	002	DF	00800	P	X910
d.		Waste Chemical Process Solid (ammonium phosphate) non-DOT/non-RCRA (X910)	001	DM	00400	P	X911

J. Additional Descriptions for Materials Listed Above
L ~~sodium silicate 80% sodium dodecylbenzenesulfonate 5% diethylene glycol butyl ether 5% inert ing balance~~
S ~~monosodium phosphate 80% sodium bisulfate 5% sodium bifluoride 5% sodium molybdate 5% inert ing balance~~
S C sodium hydroxide 80-90% b. sodium carbonate 10%
S ammonium phosphate 90% d. inert ing 10%

K. Handling Codes for Wastes Listed Above
a. S01 c. S01
b. S01 d. S01

15. Special Handling Instructions and Additional Information
EPS Job#32A6572 PO#44013 a. 343224-DW001 c. 343224-BF002-01 a. NY=T b.-d. NY=L
a.-c. ERG#60 b. 343224-LM104 d. 343224-BF002 PLATE# NYC6 Transporter#1
EMERGENCY RESPONSE# 315-471-0503 - Mark Hansen U.S. EPA Superfund Site VT DEC trans. fax waived

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Dean Tagliaferro As agent for US EPA | Signature: Dean Tagliaferro | Month Day 06 03 9_

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Michael P. Daley | Signature: Michael P. Daley | Month Day Year 06 03 9_

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Mark Watt[illegible] | Signature: [illegible] | Month Day Year [illegible]

19. Discrepancy Indication Space
5a) ADD SODIUM SILICATE < 5%, ADD ≤ TO 5% 5B) ADD ≤ TO 1% NON-HAZARDOUS INGREDIENT BALANCE
5) DECAL [illegible] (C) DELETE X US DOT HM, WASTE CHEMICAL PROCESS SOLID, NON DOT/NON RCRA, BREAK UN1759 (D002) 5C) ADD DIETHYLENE GLYCOL BUTYL ETHER ≤ 5%, ADD [illegible]

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: [illegible] Page | Signature: [illegible] | Month Day Year 06 05 9_

HRS Reference #39

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

3 — TSD MAIL TO - GENERATOR

CYCLE CHEM

RECYCLING TREATMENT & DISPOSAL OF HAZARDOUS WASTE

RECEIVED JUL 0 8 1992

7/01/92

US EPA REGION 1
60 WESTVIEW STREET
LEXINGTON MA 02173-0000

EPSALB

126 BOWEN ROAD
BENNINGTON VT 05201-000

RE: Certificate of Disposal

Dear Sir/Madam:

This letter is to certify that Cycle Chem, Inc. EPA ID No. NJD002200046 has accepted and processed the following shipments.

This acceptance is in accordance with all State and Federal Regulations and with the conditions set forth in Cycle Chem's Hazardous Waste Facility Permit.

PROD CODE	SEQ #	MANIFEST IN	DATE IN/ DATE OUT	MANIFEST OUT	SENT	DISPOSAL SITE AND METHOD
BF002	00	NJA1464453	6/05/92 6/23/92	MI2710463	1 DM	MICHIGAN DISPOSAL INC. STABILIZE AND LANDFILL
BF002	01	NJA1464453	6/05/92 6/23/92	MI2710463	2 DF	MICHIGAN DISPOSAL INC. STABILIZE AND LANDFILL
DW001	00	NJA1464453	6/05/92 6/18/92	NJA1151813	1 DF	E. I. DUPONT DENEMOURS WASTEWATER TREATMENT
LM104	00	NJA1464453	6/05/92 6/24/92	MI2710472	1 DF	MICHIGAN DISPOSAL INC. STABILIZATION/LANDFILL

If there are any further questions about the disposal of your waste, please do not hesitate to call.

Sincerely,

Gary Hoadley Sr

Gary Hoadley
General Manager

RECEIVED
JUL 27 1992
ENVIRONMENTAL OIL, INC.
OF ALBANY

VHW-001 (REV. 9/96)

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-9

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741 Manifest Document No.: 00004
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: U.S. E.P.A. - Region 1, 60 Westview Street, Lexington, MA 02173 — ATTN: Dean Tagliaferro
4. Generator's Phone (617) 860-4625

A. State Manifest Document Number: NJA 1247383
B. State Generator's ID: 126 Bowen Road, Bennington, VT 05201

5. Transporter 1 Company Name: Environmental Products & Services Inc
6. US EPA ID Number: NYD980761191
C. State Trans. ID: NYSDEC 7A010
D. Transporter's Phone (315) 471-0503

7. Transporter 2 Company Name: Environmental Products & Services Inc
8. US EPA ID Number: NYD980761191
E. State Trans. ID: NJDEPE 50080
Tractor:20433 Trailer:20440
F. Transporter's Phone (315) 471-0503

9. Designated Facility Name and Site Address: Cycle Chem, Inc., 217 South First Street, Elizabeth, NJ 07206
10. US EPA ID Number: NJD002200046
G. State Facility's ID
H. Facility's Phone (908) 355-5800

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Waste Chemical Process Liquid non-DOT/non-RCRA (X900)		001	DM	00055	G	X900
b. Waste Alkaline Liquid, n.o.s. (potassium hydroxide) Corrosive Material NA1719 (D002)	X	004	DM	00120	G	D002
c. Waste Compound, Cleaning, Liquid (containing potassium hydroxide) Corrosive Material NA1760 (D002)	X	001	DM	00055	G	D002
d. Waste Compound, Cleaning, Liquid (containing Sodium hydroxide) Corrosive Material NA1760 (D002)	X	001	DM	00055	G	D002

J. Additional Descriptions for Materials Listed Above
a. L soybean oil 100%
c. LC potassium hydroxide 50% inert ingredients 50%
b. L C potassium hydroxide-25% inorganic phosphate salt 2.2% inert ingredients 72.8%
d. L C sodium hydroxide 2% inert ingredients 98%

K. Handling Codes for Wastes Listed Above
a. S01 c. S01
b. S01 d. S01

15. Special Handling Instructions and Additional Information
EPS Job#32A6572 PO#44013 a.343224--IS c. 343224-DW001-03 a. NY=B b.- d. NY=T
b.-d.-ERG#60 b. 343224-DW001-01 d. 343224-DW001-02 PLATE# NYX6419 Transporter#1
EMERGENCY RESPONSE#315-471-0503- Mark Hansen

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. US EPA [illegible] VTDEC has [illegible]

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Dean Tagliaferro As agent for USEPA | Signature: [signature] | Month Day Year: 06 03 97

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: MICHAEL P. DALEY | Signature: [signature] | Month Day Year: 06 03 97

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: Mark Watkins | Signature: [signature] | Month Day Year: 06 04 97

FACILITY

19. Discrepancy Indication Space: IA) ADD EPOXIDIZED

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Kelen PAPE | Signature: [signature] | Month Day Year: 06 05 97

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.
HRS Reference #89

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES
3 — TSD MAIL TO - GENERATOR

CYCLE CHEM
RECYCLING TREATMENT & DISPOSAL OF HAZARDOUS WASTE

10/26/92

US EPA REGION 1
60 WESTVIEW STREET
LEXINGTON MA 02173-0000

EPSALB
126 BOWEN ROAD
BENNINGTON VT 05201-00

RE: Certificate of Disposal

Dear Sir/Madam:

This letter is to certify that Cycle Chem, Inc. EPA ID No. NJD002200046 has accepted and processed the following shipments.

This acceptance is in accordance with all State and Federal Regulations and with the conditions set forth in Cycle Chem's Hazardous Waste Facility Permit.

PROD CODE	SEQ #	MANIFEST IN	DATE IN/ DATE OUT	MANIFEST OUT	SENT	DISPOSAL SITE AND METHOD
DW001	01	NJA1247383	6/05/92 6/18/92	NJA1151813	4 DM	E. I. DUPONT DENEMOURS WASTEWATER TREATMENT
DW001	02	NJA1247383	6/05/92 10/14/92	NJA1388949	1 DM	E. I. DUPONT DENEMOURS WASTEWATER TREATMENT
DW001	03	NJA1247383	6/05/92 10/14/92	NJA1388949	1 DM	E. I. DUPONT DENEMOURS WASTEWATER TREATMENT
PET004	00	NJA1247383	6/05/92 7/02/92	MI2710482	1 DM	PETRO-CHEM PROCESSING, INC. FUEL BLENDING

If there are any further questions about the disposal of your waste, please do not hesitate to call.

Sincerely,

Gary Hoadley Sr

Gary Hoadley
General Manager

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VTD044818174 Manifest Document No. 99001

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law

GENERATOR

3. Generator's Name and Mailing Address
USEPA REGION I
60 WESTVIEW ST LEXINGTON MA 02173
4. Generator's Phone (617) 223 7265

A. State Manifest Document Number

B. State Generator's ID 136 BOWEN RD BARRINGTON

5. Transporter 1 Company Name FREEHOLD CARTAGE INC
6. US EPA ID Number NJD054136164
C. State Transporter's ID 1384 CCRS
D. Transporter's Phone 908 462 1001

7. Transporter 2 Company Name NECK
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address OSCO TREATMENT SYSTEMS INC
618 GRASSMERE DRIVE
NASHVILLE, TN 37211
10. US EPA ID Number TND981922836
G. State Facility's ID
H. Facility's Phone 615 832-0081

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ HAZARDOUS WASTE LIQUID, N.O.S. (CONTAINS TETRACHLOROETHYLENE, LEAD, TOLUENE, ETHYLBENZENE) ORM-E NA9189	X	001	TT	0346	G	D003 D040 F003 F003, Fa
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
TL
PROFILE # 23487

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information VT DEC TRANSPORTER & GENERATOR TAX WAIVED
ERG # 31
EMERGENCY CONTACT: ENVIRONMENTAL TECHNOLOGY 1-800-533-4043

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Yr
Dean Tagliaferro As agent for US EPA	Dean Tagliaferro	10	24	92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Yr
Timothy B. Conklin	Timothy B Conklin	10	24	92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Yr

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Yr
Allen Pendarvis	Allen Pendarvis	10	26	92

Style F15 REV-6 LABELMASTER, Div. of AMERICAN LABELMARK CO., CHICAGO, IL 60646

EPA Form 8700-22 (Rev. 9-88) Previous editions are obso-

ORIGINAL-RETURN TO GENERATOR

OSCO INC.

BRYSON Industrial Services, Inc.

Certificate of Treatment, Storage, and/or Disposal

OSCO Treatment Systems, Inc. certifies that on the 26th day of June, 1992, waste material received from USEPA Region I described on Uniform Hazardous Waste Manifest number 00001 was managed in compliance with all State and Federal laws and regulations, including 40 CFR 260 through 265.

OSCO Treatment Systems, Inc.
7230 Centennial Place
Nashville, TN 37209

OSCO Treatment Facility EPA Number TND981922826

By: Larry P Walker
Larry P. Walker
Plant Manager/Vice-President

Methods of Treatment: S02, T23, T31, T40, T67

Should you have any futher questions, please do not hesitate to contact our Customer Service department at (615) 832-0081.

Note: Please retain the enclosed Generator copy of the manifest for your records.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VTD014811417 — Manifest Document No. 10002

2. Page 1 of — Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
U.S. EPA Region I
60 Westview St
Lexington, MA 02173

4. Generator's Phone (617) 223-7265

A. State Manifest Document Number

B. State Generator's ID 126 Bowen Rd Bennington, VT

5. Transporter 1 Company Name: Freehold Cartage — 6. US EPA ID Number: NJD054112614

C. State Transporter's ID

D. Transporter's Phone (908) 462-1001

7. Transporter 2 Company Name — 8. US EPA ID Number

E. State Transporter's ID NJT312M

F. Transporter's Phone

9. Designated Facility Name and Site Address
OSCO Treatment Systems Inc
618 Grassmere Park Drive
Nashville, TN 37211 — 10. US EPA ID Number: TND981922826

G. State Facility's ID

H. Facility's Phone (615) - 832-0081

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Waste Liquid, N.O.S. ORM-E NA 9189 (Trichloroethylene, lead, toluene, ethylbenzene, xylene)		001	TT	03425 ~~03425~~ (D.T)	G	D008, D040 F002, F003 F005
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
T, L
Profile #23487

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
ERG # 31
Emergency Contact: Environmental Technology 1-800-533-4042
VT DEC Transporter & generator fee waived for this Superfund Site

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day
Dean Tagliaferro As agent for USEPA	Dean Tagliaferro	06	14

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day
P.W.L.P. KALE		06	24

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day
Allen Pendarvis	Allen Pendarvis	06	26

Style F15 REV-6 LABELMASTER, Div. of AMERICAN LABELMARK CO., CHICAGO, IL 60646

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsol

ORIGINAL-RETURN TO GENERATOR

BRYSON
Industrial Services, Inc.

Certificate of Treatment, Storage, and/or Disposal

OSCO Treatment Systems, Inc. certifies that on the 26th day of June, 1992, waste material received from U.S.E.P.A. Region I described on Uniform Hazardous Waste Manifest number 00002 was managed in compliance with all State and Federal laws and regulations, including 40 CFR 260 through 265.

OSCO Treatment Systems, Inc.
7230 Centennial Place
Nashville, TN 37209

OSCO Treatment Facility EPA Number TND981922826

By: Larry P. Walker
Larry P. Walker
Plant Manager/Vice-President

Methods of Treatment: S02, T23, T31, T40, T67

Should you have any futher questions, please do not hesitate to contact our Customer Service department at (615) 832-0081.

Note: Please retain the enclosed Generator copy of the manifest for your records.

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039. expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VT D 0 4 8 1 4 1 7 4 1 — Manifest Document No. 64656 — 2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: USEPA REGION I, ATTN: CAROL TUCKER (OSC), 60 WESTVIEW STR., LEXINGTON, MA. 02173

4. Generator's Phone (617) 223-7265

A. State Manifest Document Number: 00064656

B. State Generator's ID: JARD SITE 995: 126 BOWEN RD. BENNINGTON VERMONT

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANS.
6. US EPA ID Number: DE D 980 918 858

C. State Transporter's ID: 40756
D. Transporter's Phone: (713)-930-4500

7. Transporter 2 Company Name:
8. US EPA ID Number:

E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address: ROLLINS ENVIRONMENTAL SERVICES (TX) INC., 2027 BATTLEGROUND RD., DEER PARK, TEXAS 77536
10. US EPA ID Number: TX D 055 141 378

G. State Facility's ID: 50089
H. Facility's Phone: (713)-930-2300

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
X	a. HAZARDOUS WASTE LIQUID, N.O.S. (DIOCTYL PTHALATE, PETROLEUM OILS) ORM-E NA9189	001	TT	7700 ~~02800~~	K (M.L.) ~~G~~	910450
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above: WASTE APPROVAL H.O. NO. 61165
Out of Service DATE 10-13-92 [illegible]

K. Handling Codes for Wastes Listed Above: T06

15. Special Handling Instructions and Additional Information:
ERG GUIDE NO. 31
11a.) TSCA WASTE CODE: PCB1
VERMONT WASTE NO. VT 01
CERTIFICATE OF DISPOSAL REQUIRED
EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Carol Tucker for US EPA — Signature: Carol Tucker for US EPA — Month/Day/Year: 10/13/92

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: John Henderson — Signature: John Henderson — Date: 10/13/92

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name: — Signature: — Date:

19. Discrepancy Indication Space
PER MY PHONE CONVERSATION WITH Carol Tucker THE ABOVE QUANTITY HAS BEEN CHANGED TO REFLECT THE ACTUAL AMOUNT RECEIVED BY RES (TX) INC. Melvina Loffler 10/28/92

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
RES (TX) INC
Printed/Typed Name: R. HARRISON — Signature: Harrison — Date: 10/15/92

HRS Reference #39

TWC-0311 (Rev. 01/01/89) — White - original — Pink-TSD Facility — Yellow-Transporter — Green-Generator's first copy

PROGRAM-ID: PTR1722C ROLLINS ENVIRONMENTAL SERVICES (TX) INC
RUN DATE : 11/05/92 CERTIFICATE OF DISPOSAL
RUN TIME : 12:31 PM PAGE: 1

Certificate of Disposal Name and Address	Stream Number	Order Number	Manifest Number	Received Date	Final Disposal
	061165	147942	TX00064656	10/15/92	10/27/92

USEPA REGION I
60 WESTVIEW STREET
LEXINGTON MA 02173
Attn: CAROL TUCKER (OSC)

Inventory Cntrl Nbr	Customer's Unique Serial Number	CONTAINER Type	CONTAINER Contents	Prod Code	SHP TO	Disposal Mthd	Disposal Date
000147942		GAL	LIQUID	38		I	10/27/92

Total Containers : 1

This completes the Certificates of Destruction per Manifest Number TX00064656.

Disposal Methods :	
	'I' - Waste that was incinerated.
	'L' - Waste that was landfilled.
Disposal Facility :	ROLLINS ENVIRONMENTAL SERVICES (TX) INC
(Incinerated Waste)	PO BOX 609
	DEER PARK TX 77536
EPA ID:	TXD055141378

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Disposal.

Authorized Agent
ROLLINS ENVIRONMENTAL SERVICES (TX) INC

ROLLINS
ENVIRONMENTAL SERVICES (TX) INC.
P.O. Box 609, Deer Park, TX 77536, 713/930-2300, FAX 713/930-2316

CONFIRMATION OF RECEIPT OF MANIFESTED WASTE

GENERATOR NAME/ADDRESS: USEPA Region I
Lexington, MA

STATE MANIFEST DOCUMENT NO.: 000644656

DATE OF RECEIPT AT FACILITY: 10/15/92

Enclosed is your original, completely signed Manifest which indicates acceptance of material (with discrepancies as indicated, if any) by Rollins Environmental Services (TX) Inc.

Melvina Reffe
RES (TX), Inc.

10/28/92
Date

147939

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-3_

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: VTD048141741
Manifest Document No.: 64655
2. Page 1 of 1
Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address: ATTN: CAROL TUCKER (OSC) USEPA REGION I, 60 WESTVIEW STR., LEXINGTON, MA. 02173
4. Generator's Phone (617) - 223 - 7265

A. State Manifest Document Number: 00064655
B. State Generator's ID: JARD SITE 126 BOWEN STR. 99950 IND BENNINGTON, VERMON

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANS.
6. US EPA ID Number: DED980918858
C. State Transporter's ID: 40756
D. Transporter's Phone: (713) - 930 - 450

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: ROLLINS ENVIRONMENTAL SERVICES (TX), INC., 2027 BATTLEGROUND RD., DEER PARK, TEXAS 77536
10. US EPA ID Number: TXD055141378
G. State Facility's ID: 50089
H. Facility's Phone: (713) - 930 - 2300

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
X	a. RQ WASTE FLAMMABLE LIQUID, N.O.S. (TOLUENE, XYLENE) FLAMMABLE LIQUID UN1993	001	TT	~~02000~~ 7527	~~G~~ K	916600
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above: WASTE APPROVAL H.O. No. 61168
Out of Service date: 10-13-92 CGT bys Jole

K. Handling Codes for Wastes Listed Above: T06

15. Special Handling Instructions and Additional Information: ERG GUIDE NO. 27
11a.) VERMONT WASTE NO. VT 01
CERTIFICATE OF DISPOSAL REQUIRED
EMERGENCY CONTACT NO. (617) - 223 - 7265 USEPA REGION I

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Carol Tucker for USEPA
Signature: Carol Tucker for USEPA
Month Day Year: 1 0 1 3 9

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Charles Darvey
Signature: [signature]
Month Day Year: 1 0 1 3 9

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space: Per my telephone conversation with Carol Tucker, the above quantity has been changed to reflect the actual Kilograms received by RES (TX). M. Dunnigan 10/20/92

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
RES (TX)
Printed/Typed Name: L. JEPSEN
Signature: L. Jepsen
Month Day Year: 1 0 1 5 9

HRS Reference #39

TWC-0311 (Rev. 01/01/89)
White - original   Pink-TSD Facility   Yellow-Transporter   Green-Generator's first copy

PROGRAM-ID: PTR1722C ROLLINS ENVIRONMENTAL SERVICES (TX) INC
RUN DATE : 10/29/92 CERTIFICATE OF DISPOSAL
RUN TIME : 11:39 AM PAGE: 1

Certificate of Disposal Name and Address	Stream Number	Order Number	Manifest Number	Received Date	Final Disposal
	061168	147939	TX00064655	10/15/92	10/21/92

US EPA REGION I
60 WESTVIEW STREET
LEXINGTON MA 02173
Attn: CAROL TUCKER (OSC)

Inventory Cntrl Nbr	Customer's Unique Serial Number	CONTAINER Type	CONTAINER Contents	Prod Code	SHP TO	Disposal Mtnd	Disposal Date
000147939		GAL	LIQUID	46		I	10/21/92

Total Containers : 1

This completes the Certificates of Destruction per Manifest Number TX00064655.

Disposal Methods :	
	'I' - Waste that was incinerated.
	'L' - Waste that was landfilled.
Disposal Facility :	ROLLINS ENVIRONMENTAL SERVICES (TX) INC
(Incinerated Waste)	PO BOX 609
	DEER PARK TX 77536
EPA ID:	TXD055141378

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Disposal.

Authorized Agent
ROLLINS ENVIRONMENTAL SERVICES (TX) INC

ROLLINS
ENVIRONMENTAL SERVICES (TX) INC.
P.O. Box 609, Deer Park, TX 77536, 713/930-2300, FAX 713/930-2316

CONFIRMATION OF RECEIPT OF MANIFESTED WASTE

GENERATOR NAME/ADDRESS: US EPA Region I
Lexington MA

STATE MANIFEST DOCUMENT NO.: 00064655

DATE OF RECEIPT AT FACILITY: 10-15-92

Enclosed is your original, completely signed Manifest which indicates acceptance of material (with discrepancies as indicated, if any) by Rollins Environmental Services (TX) Inc.

Kathleen Hanna
RES (TX), Inc.

10-16-92
Date

147941

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039. expires 09-3

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VTD048141741 Manifest Document No. 64654

2. Page 1 of 1

Information in the shaded areas is not required by Federal law

3. Generator's Name and Mailing Address
ATTN: CAROL TUCKER (OSC) USEPA REGION I
60 WESTVIEW STR.
LEXINGTON, MA. 02173

4. Generator's Phone (617) -223-7265

A. State Manifest Document Number 00064654

B. State Generator's ID JARD SITE 99
126 BOWEN RD.
BENNINGTON, VERMONT

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANSPORT

6. US EPA ID Number: D.E.D.980.9.1.8.8.5.8

C. State Transporter's ID 40756

D. Transporter's Phone (713)-930-4500

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
ROLLINS ENVIRONMENTAL SERVICES (TX), INC.
2027 BATTLEGROUND RD.
DEER PARK, TEXAS 77536

10. US EPA ID Number: TXD.055.141.378

G. State Facility's ID 50089

H. Facility's Phone (713)-930-2300

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
X	a. RQ HAZARDOUS WASTE LIQUID, N.O.S. (TRICHLOROETHYLENE) ORM-E NA9189	001	TT	7709 02000	K (M.L.) G	915890
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above
WASTE APPROVAL HO NO. 61166

K. Handling Codes for Wastes Listed Above
T06

15. Special Handling Instructions and Additional Information
ERG GUIDE NO. 31
11a.) VERMONT WASTE NO. VT-01 OUT OF SERVICE DATE 10/18/92
CERTIFICATE OF DISPOSAL REQUIRED ✓ EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Carol Tucker for USEPA	Carol Tucker for USEPA	10	19	92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Steven D. Helscher	Steven D. Helscher	10	19	92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space
PER MY PHONE CONVERSATION WITH Carol Tucker THE ABOVE QUANTITY HAS BEEN CHANGED TO REFLECT THE ACTUAL AMOUNT RECEIVED BY RES (TX) INC. Melvin Griffin 10/23/92

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
RES (TX) INC Paul Min HRS Reference #39		10	21	92

TWC-0311 (Rev. 01/01/89) White - original Pink-TSD Facility Yellow-Transporter Green-Generator's first copy

ROLLINS
ENVIRONMENTAL SERVICES (TX) INC.
P.O. Box 609, Deer Park, TX 77536, 713/930-2300, FAX 713/930-2316

CONFIRMATION OF RECEIPT OF MANIFESTED WASTE

GENERATOR NAME/ADDRESS: USEPA REGION I
LEXINGTON MA

STATE MANIFEST DOCUMENT NO.: 00064654

DATE OF RECEIPT AT FACILITY: 10-21-92

Enclosed is your original, completely signed Manifest which indicates acceptance of material (with discrepancies as indicated, if any) by Rollins Environmental Services (TX) Inc.

Kathleen Hanna
RES (TX), Inc.

10-23-92
Date

PROGRAM-ID: PTR1722C ROLLINS ENVIRONMENTAL SERVICES (TX) INC
RUN DATE : 11/19/92 CERTIFICATE OF DISPOSAL
RUN TIME : 11:54 AM PAGE: 1

Certificate of Disposal Name and Address	Stream Number	Order Number	Manifest Number	Received Date	Final Disposal
	061166	147941	TX00064654	10/21/92	11/07/92

US EPA REGION I
60 WESTVIEW STREET
LEXINGTON MA 02173
Attn: CARL TUCKER

Inventory Cntrl Nbr	Customer's Unique Serial Number	CONTAINER Type	CONTAINER Contents	Prod Code	SHP TO	Disposal Mthd	Disposal Date
000147941		GAL	LIQUID	46		I	11/07/92

Total Containers : 1

This completes the Certificates of Destruction per Manifest Number TX00064654.

Disposal Methods :	
	'I' - Waste that was incinerated.
	'L' - Waste that was landfilled.
Disposal Facility :	ROLLINS ENVIRONMENTAL SERVICES (TX) INC
(Incinerated Waste)	PO BOX 609
	DEER PARK TX 77536
EPA ID:	TXD055141378

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Disposal.

Authorized Agent
ROLLINS ENVIRONMENTAL SERVICES (TX) INC

ORIGINAL—NOT NEGOTIABLE

Shipper No. _____

Carrier No. _____

Page 1 of 1 — BLUE DIAMOND Co. (Name of Carrier) (SCAC) — Date 10/20/92

TO: Consignee CARDINAL COMPLIANCE CORP.
On Collect on Delivery shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1.
Street P.O. Box 3471
CAMDEN, N.J. 08101
Destination CARDINAL COMPLIANCE CORP. BALTIMORE, MD. 4201 E. FAIRMONT AVE. Zip Code 21224

FROM: Shipper ENVIRONMENTAL TECHNOLOGY OF NORTH AMERICA, INC.
Street 3705 SAUNDERS AVE. RICHMOND, VA. 23227
Origin USEPA REGION I ERCS SITE JARD Co., INC. SUPERFUND SITE 126 BOWEN RD. BENNINGTON, VERMONT

Route RT. 9 TO I-91 TO I-95 SOUTH TO BALTIMORE, MARYLAND.

Vehicle Number TRAILER NO. 35775

No. of Units & Container Type	HM	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203	UN# or NA#	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
279 EMPTY CONTAINERS		EMPTY DRUMS AND CONTAINERS	N/A	11,000 LBS.	Approx. 11,000 LBS.		
		NON-HAZARDOUS / RCRA NON-HAZ					
		BREAKDOWN ON CONTAINERS: 276 x 55 gal. size					
		3 x 5 gal. size					

PLACARDS TENDERED: YES ☐ NO ☒ NONE REQUIRED

REMIT C.O.D. TO: ADDRESS N/A

Note — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ per _____ N/A

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport by ■ Rail ■ Highway ■ Water (DELETE NON-APPLICABLE MODE OF TRANSPORT) according to applicable international and national governmental regulations.
_____ Signature

COD Amt: $ N/A
Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ (Signature of Consignor)

C.O.D. FEE: PREPAID ☐ COLLECT ☐ $ N/A
TOTAL CHARGES: $
FREIGHT CHARGES — FREIGHT PREPAID except when box at right is checked ☐ Check box if charges are to be collect

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER ENVIRONMENTAL TECHNOLOGY OF NORTH AMERICA, INC. — CARRIER BLUE DIAMOND Co.

PER [signature] RAY WILLIS — PER [signature]

RA SE | AGE | DATE

1

CARDINAL COMPLIANCE CORPORATION

CERTIFICATE OF DESTRUCTION

THIS HEREBY CERTIFIES THAT ALL MATERIAL ON OUR INVOICE NO: 021121, DATED 10/21/92 AND INVOICE NO: 021151, DATED 10/28/92

FROM: ENVIRONMENTAL TECHNOLOGY
- JARD SITE -

HAS BEEN DESTROYED BY THIS DATE: 11/5/92

EXECUTED BY:

C Kaplan /DR

CARDINAL COMPLIANCE CORPORATION

125 Strafford Avenue
Suite 200
Wayne, Pennsylvania 19087

215-688-8118
800-822-8826
Fax 215-688-9165

48-14-1 (3/89)—7f

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. VTD048141741 Manifest Document No. 47521 2

2. Page 1 of 1 — Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
ATTN: CAROL TUCKER (USC)
USEPA REGION I
60 WESTVIEW STR.
LEXINGTON, MA. 02173

A. State Manifest Document No. NY B 434752 2

B. Generator's ID JARD SITE
126 BOWEN RD. BENNINGTON, VT.

4. Generator's Phone (617) - 223-7265

5. Transporter 1 (Company Name) TONAWANDA TANK TRANSPORT

6. US EPA ID Number NYD097644801

C. State Transporter's ID 716332 NY

D. Transporter's Phone (716) -873-9703

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, INC.
1550 BALMER RD.
MODEL CITY, NEW YORK 14107

10. US EPA ID Number NYD049836679

G. State Facility's ID

H. Facility's Phone (716) - 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS) ZINC ORM-E NA9188	001	DT	14624 ~~14523~~	K	EPA * STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
RQ = LB.
a PCBs, ZINC
b
c
d

K. Handling Codes for Wastes Listed Above
a L
b
c
d

15. Special Handling Instructions and Additional Information
Bq.) CWM PROFILE NO. BD1927-ADC
WORK ORDER NO. [redacted]208028
CERTIFICATE OF DISPOSAL REQUIRED
ERG No. 31
ACCUMULATION START DATE 10/15/92
VERMONT WASTE NO. VT-01
EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I
* NO NUMBER ASSIGNED BY RCRA

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
CAROL Tucker for US EPA	Carol Tucker for US EPA	10	31	92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
LARRY Hill	Larry Hill	10	21	92

18. Transporter 2 (Acknowledgement or Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
Actual Qty Rcvd 14624 K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
Lynn Piechowski	Lynn Piechowski	10	22	92

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

NY 434752 2

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716 754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGION I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347522. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance wit the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20802800
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Kathleen J. Arigoni

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2463
10/23/92

48-14-1 (3/89)—71

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: VTD048141741 — Manifest Document No.: 47547
2. Page 1 of 1

Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address: USEPA REGION I, ATTN: CAROL TUCKER (OSC), 60 WESTVIEW STR., LEXINGTON, MA. 02173
4. Generator's Phone (617) - 223-7265

A. State Manifest Document No. NY B 434754 9

B. Generator's ID: JACS SITE, 126 BOWEN RD. BENNINGTON, VT.

5. Transporter 1 (Company Name): TONAWANDA TANK TRANSPORT
6. US EPA ID Number: NYD097644801

C. State Transporter's ID: E69850 AE

D. Transporter's Phone (716) - 873-9703

7. Transporter 2 (Company Name):
8. US EPA ID Number:

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address: CWM CHEMICAL SERVICES, INC., 1550 BALMER RD., MODEL CITY, NEW YORK 14107
10. US EPA ID Number: NYD049836679

G. State Facility's ID

H. Facility's Phone (716) - 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS, ZINC) ORM-E NA9188	001	DT	~~20255~~ 19768 LP	K	EPA * / STATE B007
b.					EPA / STATE
c.					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a. RQ = 1LB. PCBS, ZINC
c.
b.
d.

K. Handling Codes for Wastes Listed Above
a. L
c.
b.
d.

15. Special Handling Instructions and Additional Information: ERG No. 31
11a.) CWM PROFILE NO. BD1927-MDC
WORK ORDER NO. ~~207882~~ 201908
ACCUMULATION START DATE 10/15/92
VERMONT WASTE NO. VT-01
CERTIFICATE OF DISPOSAL REQUIRED
EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I
* NO NUMBER ASSIGNED BY ...

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Carol Tucker for USEPA — Signature: Carol Tucker for US EPA — Mo. Day Year: 10 21 92

17. Transporter 1 (Acknowledgement of Receipt of Materials)
Printed/Typed Name: BRUCE E. YOCUM — Signature: Bruce E. Yocum — Mo. Day Year: 10 21 92

18. Transporter 2 (Acknowledgement of Receipt of Materials)
Printed/Typed Name — Signature — Mo. Day Year

19. Discrepancy Indication Space: Actual Recd 19768K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Kath Villeneuve — Signature: Kath Villeneuve — Mo. Day Year: 10 22 92

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

NY 434754 9

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

HRS Reference #39

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGION I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347549. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance wit the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20790800
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Kathleen J. Arigoni

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2454
10/23/92

48-14-1 (3/89)—71

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. VTD048141741 — Manifest Document No. 47558

2. Page 1 of 1 — Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
ATTN: CAROL TUCKER (CSC)
USEPA REGION I
60 WESTVIEW ST.
LEXINGTON, MA. 02173

4. Generator's Phone (617) -223-7265

A. State Manifest Document No. NY B 434755 8

B. Generator's ID JARD SITE
126 BOWEN RD. BENNINGTON, VT.

5. Transporter 1 (Company Name)
Tonawanda Tank Transport

6. US EPA ID Number NYD097644801

C. State Transporter's ID E69849 ME

D. Transporter's Phone (716) 873-9703

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, INC.
1550 BALMER RD.
MODEL CITY, NEW YORK 14107

10. US EPA ID Number NYD049836479

G. State Facility's ID

H. Facility's Phone (716) - 754 - 8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity L.P	14. Unit Wt/Vol	I. Waste No.
GENERATOR a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS, 2.NC) ORM-E NA9188	001	DT	15241 ~~14791~~	K	EPA * STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a. RQ 1 LB. PCB's, ZINC
c.
b.
d.

K. Handling Codes for Wastes Listed Above
a. L
c.
b.
d.

15. Special Handling Instructions and Additional Information
#4.) CWM PROFILE NO. BD1927-MDC
WORK ORDER NO. 207875
CERTIFICATE OF DISPOSAL REQUIRED
ERG No. 31
ACCUMULATION START DATE 10/5/92
VERMONT WASTE NO. VT-01
EMERGENCY CONTACT No. (617)-223-7265 USEPA REGION I
* NO NUMBER ASSIGNED BY RCRA

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
Carol Tucker for USEPA	Carol Tucker for USEPA	10	21	92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
LARRY SCLEMIS		10	21	92

18. Transporter 2 (Acknowledgement or Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
Actual Rcvd 15241K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
Patti Villeneuve	Patti Villeneuve	10	22	92

NY B 434755 8

EPA Form 8700-22 (Rev. Feb. 1988) Previous editions are obsolete.

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGION I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347558. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance with the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20787500
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Kathleen J. Arigoni

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2449
10/23/92

48-14-1 (3/89)—71

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. VTD048141741 Manifest Document No. 47567
2. Page 1 of 1 — Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
ATTN: CAROL TUCKER (OSC)
USEPA REGION I
60 WESTVIEW STR.
LEXINGTON, MA. 02173

4. Generator's Phone (617) - 223-7265

A. State Manifest Document No. NY B 434756 7

B. Generator's ID JARD SITE
126 BOWEN RD. BENNINGTON, VT.

5. Transporter 1 (Company Name) Buffalo Fuels Corp

6. US EPA ID Number NYD051809952

C. State Transporter's ID 85903D N.Y.

D. Transporter's Phone (716) - 773-1921

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, INC.
1550 BALMER RD.
MODEL CITY, NEW YORK 14107

10. US EPA ID Number NYD049836679

G. State Facility's ID

H. Facility's Phone (716) - 754 - 8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS, ZINC) ORM-E NA9188	001	DT	19886	K	EPA * STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a. RQ TILS. PCB's, ZINC
c.
b.
d.

K. Handling Codes for Wastes Listed Above
a. L
c.
b.
d.

15. Special Handling Instructions and Additional Information
ERG NO. 31
* NO NUMBER ASSIGNED BY RCRA
11a.) CWM PROFILE NO. BJ1927-NDC
ACCUMULATION START DATE 10/15/92
VERMONT WASTE NO. VT-01
WORK ORDER NO. 207906
CERTIFICATE OF DISPOSAL REQUIRED
EMERGENCY CONTACT NO. (617) 223-7265 USEPA REGION I

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
Carol Tucker for USEPA	Carol Tucker for USEPA	10	31	92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
Edward C. Konath	Edward C Konath	10	31	92

18. Transporter 2 (Acknowledgement or Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
Actual Recd 19886 K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
Kathi Villeneuve	Kathi Villeneuve	11	2	92

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGION I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347567. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance with the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20790600
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Kathleen J. Arigoni

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2452
10/23/92

48-14-1 (3/89)—7f

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. VTD048141741 — Manifest Document No. 47576

2. Page 1 of 1 — Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
ATTN: CAROL TUCKER (OSC)
USEPA REGION I
60 WESTVIEW ST.
LEXINGTON, MA. 02173

A. State Manifest Document No. NY B 434757 6

4. Generator's Phone (617) - 223-7265

B. Generator's ID JADD SITE
126 BONNEY RD.
BENNINGTON, VERMONT

5. Transporter 1 (Company Name): Chemical Waste Management, Inc.

6. US EPA ID Number: ILD099202681

C. State Transporter's ID 14645VNY

D. Transporter's Phone (716) 879-0600

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, INC.
1550 BALMER RD.
MODEL CITY, NEW YORK 14107

10. US EPA ID Number: NYD049836679

G. State Facility's ID

H. Facility's Phone (716) - 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
GENERATOR a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS, ZINC) ORM-E NA9188	001	DT	17563 ~~17723~~	KP	EPA * STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
RQ = LB.
a PCB's, ZINC
b
c
d

K. Handling Codes for Wastes Listed Above
a [L] c [ ]
b [ ] d [ ]

15. Special Handling Instructions and Additional Information
ERG NO. 31
11a.) CWM PROFILE NO. BD1927-WDC
ACCUMULATION START DATE 10/15/92
WORK ORDER NO. 20788
VERMONT WASTE NO. VT-01
CERTIFICATE OF DISPOSAL REQUIRED
EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I
* NO NUMBER ASSIGNED BY RCRA

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

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Printed/Typed Name	Signature	Mo.	Day	Year
CAROL Tucker for USEPA	Carol Tucker for USEPA	10	21	92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
ROBERT J. DUNN	Robert J. Dunn	10	21	92

18. Transporter 2 (Acknowledgement or Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
Actual Qty Recd 17563 K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
Lynn Piechowski	Lynn Piechowski	10	22	92

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGIOI I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347576. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance wit the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20788200
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Kathleen J. Arigoni

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2450
10/23/92

48-14-1 (3/89)—7f

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

Please print or type. Do not Staple.

P.O. Box 12820, Albany, New York 12212

Form Approved. OMB No. 2050-0039. Expires 9-30-94

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: VTD048141741 — Manifest Document No.: 47585
2. Page 1 of 1 — Information in the shaded areas is not required by Federal Law.

GENERATOR

3. Generator's Name and Mailing Address
ATTN: CAROL TUCKER (OSC)
USEPA REGION I
60 WESTVIEW ST.
LEXINGTON, MA. 02173

A. State Manifest Document No.: NY B 434758 5

B. Generator's ID: JARD SITE
126 BOWEN RD. BENNINGTON, VT.

4. Generator's Phone (617) - 223-7265

5. Transporter 1 (Company Name): BUFFALO FUEL CORP.
6. US EPA ID Number: NYD051809952
C. State Transporter's ID: 45083T N.Y.
D. Transporter's Phone (716) - 773-192

7. Transporter 2 (Company Name)
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, INC.
1550 BALMER RD.
MODEL CITY, NEW YORK 14107
10. US EPA ID Number: NYD049836679
G. State Facility's ID
H. Facility's Phone: (716) - 754 - 8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS, ZINC) ORM-E NA9188	001	DT	19496 ~~19318~~	K	EPA * STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials Listed Above
a. RQ = 1 LB. PCB's, ZINC
c.
b.
d.

K. Handling Codes for Wastes Listed Above
a. [L] c. [ ]
b. [ ] d. [ ]

15. Special Handling Instructions and Additional Information
ERG NO. 31
* NO NUMBER ASSIGNED BY RCRA
11a.) CWM PROFILE NO. B31927-ADC ACCUMULATION START DATE 10/15/92
WORK ORDER NO. 207907 VERMONT WASTE NO. VT-01
CERTIFICATE OF DISPOSAL REQUIRED EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

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Printed/Typed Name	Signature	Mo.	Day	Year
Carol Tucker for USEPA	Carol Tucker for USEPA	10	23	92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
Fred Van Dusen	Fred Van Dusen	10	23	92

18. Transporter 2 (Acknowledgement or Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
Actual Qty Rec'd 19496K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
Lynn Piechowski	Lynn Piechowski	10	22	92

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGION I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347585. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance wit the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20790700
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Kathleen J. Arigoni

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2453
10/23/92

48-14-1 (3/89)—7f

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: VTD048141741 | Manifest Document No.: 47594

2. Page 1 of 1 | Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address: ATTN: CAROL TUCKER (OSC) USEPA REGION I, 60 WESTVIEW ST., LEXINGTON, MA. 02173

A. State Manifest Document No.: NY B 434759 4

4. Generator's Phone (617) - 223-7265

B. Generator's ID: JARD SITE 126 BUNKER RD. BENNINGTON, VERMONT

5. Transporter 1 (Company Name): Price Trucking Corp.

6. US EPA ID Number: NYD046765574

C. State Transporter's ID: PCV8619 NY

D. Transporter's Phone (716) 822-1414

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address: CWM CHEMICAL SERVICES, INC. 1550 BALMER RD. MODEL CITY, NEW YORK 14107

10. US EPA ID Number: NYD049836679

G. State Facility's ID

H. Facility's Phone: (716) - 754 - 8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	Unit Wt/Vol	I. Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (POLYCHLORINATED BIPHENYLS, 7.1K) ORM-E NA9188	001	DT	20593 ~~20482~~	K	EPA * STATE BC07
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a RQ=1LB. PCBs, ZINC
b
c
d

K. Handling Codes for Wastes Listed Above
a L
b
c
d

15. Special Handling Instructions and Additional Information
11h.) CWM PROFILE NO. BD1927-HDC
WORK ORDER NO. 20547
CERTIFICATE OF DISPOSAL REQUIRED
ERC NO. 31
ACCUMULATION START DATE 10/5/92
VERMONT WASTE NO. VT-01
EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I
* NO NUMBER ASSIGNED BY RCRA

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

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Printed/Typed Name	Signature	Mo.	Day	Year
Carol Tucker for USEPA	Carol Tucker for USEPA	10	21	92

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
CHARLES CROOM	Charles Croom	10	21	92

18. Transporter 2 (Acknowledgement or Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

19. Discrepancy Indication Space
actual qty rec'd 20593K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
DM Pietraszewski	DM Pietraszewski	10	22	92

GENERATOR | TRANSPORTER | FACILITY

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGION I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347594. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance with the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20804700
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2466
10/23/92

48-14-1 (3/89)—74

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. VTD048141771 — Manifest Document No. 47603 — 2. Page 1 of 1 — Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address: ATTN: CARL TUCKER (USE) USEPA REGION I, 60 WESTVIEW STR., LEXINGTON, MA. 02173

4. Generator's Phone (617) - 223 - 7265

A. State Manifest Document No. NY B 434760 3

B. Generator's ID: 1ND SITE, 126 BOWEN RD. BENNINGTON, VT.

5. Transporter 1 (Company Name): PRICE TRUCKING CORP. — 6. US EPA ID Number: NYD046765574

C. State Transporter's ID: 971RW N.Y.

D. Transporter's Phone (716 - 822-4414

7. Transporter 2 (Company Name) — 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address: CWM CHEMICAL SERVICES, INC. 1550 BALMER RD. MODEL CITY, NEW YORK 14107 — 10. US EPA ID Number: NYD049836679

G. State Facility's ID

H. Facility's Phone (716) - 754 - 8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. DRM-E NA9188 (POLYCHLORINATED BIPHENYLS, ZINC)	001	DT	19496	K	EPA # STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials Listed Above: a. RQ=LB. PCB's + ZINC

K. Handling Codes for Wastes Listed Above: a. [ ] c. [ ] b. [ ] d. [ ]

15. Special Handling Instructions and Additional Information: ERG NO. 31 — NO NUMBER ASSIGNED BY RCRA
11a) CWM PROFILE NO. BD1927-ADC — ACCUMULATION START DATE 10/15/92
WORK ORDER NO. 208051 — VERMONT WASTE NO. VT-01
CERTIFICATE OF DISPOSAL REQUIRED — EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
CARL TUCKER for USEPA	Carl Tucker for USEPA	10	21	92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
JOHN POMPEY	John Pompey	10	21	92

18. Transporter 2 (Acknowledgement or Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space: actual qty rec'd 19496 K.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
DM Pietraszewski	DM Pietraszewski	10	22	92

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGIO I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347603. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance wi the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20805100
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2468
10/23/92

48-14-1 (3/89)—7f

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. VTD048141741 — Manifest Document No. 47612

2. Page 1 of 1 — Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
ATTN: CAROL TURNER (USEPA)
USEPA REGION I
60 WESTVIEW STR.
LEXINGTON, MA. 02173

4. Generator's Phone (617) - 223-7265

A. State Manifest Document No. NY B 434761 2

B. Generator's ID JARD SITE
126 BOWEN RD.
BENNINGTON VERMONT

5. Transporter 1 (Company Name) Price Trucking Corp.

6. US EPA ID Number MYD046746557

C. State Transporter's ID 31775-A NY

D. Transporter's Phone (716) 823-1414

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, INC.
1550 BALMER RD.
MODEL CITY, NEW YORK 14107

10. US EPA ID Number NYD049836679

G. State Facility's ID

H. Facility's Phone (716) - 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	L Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. (DICHLORINATED BIPHENYLS, 2INC) ORM-E NA9188	001	DT	19845	K	EPA * STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a. RQ: LB. PCB's, ZINC
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. L
b.
c.
d.

15. Special Handling Instructions and Additional Information
H.U.) CWM PROFILE NO. BD1927-M3C
WORK ORDER NO. 703050
CERTIFICATE OF DISPOSAL REQUIRED
ERG NO. 31
ACCUMULATION START DATE 10/15/92
VERMONT WASTE NO. VT-01
EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I
* NO NUMBER ASSIGNED BY RCRA

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Mo.	Day	Year
Carol Turner for USEPA	Carol Turner for USEPA	10	31	92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year
AL EASLEY	A. Easley	11	2	92

18. Transporter 2 (Acknowledgement of Receipt of Materials)

Printed/Typed Name	Signature	Mo.	Day	Year

FACILITY

19. Discrepancy Indication Space
actual qty rec'd 19423 K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year
DM Pietraszewski	DM Pietraszewski	11	2	92

GENERATOR

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGION I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347612. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance wit the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20805000
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

Kathleen J. Arigoni

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2467
10/23/92

48-14-1 (3/90)—7f

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF HAZARDOUS SUBSTANCES REGULATION

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please print or type. Do not Staple.

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No.: VTD048141741 — Manifest Document No.: 47621
2. Page 1 of 1

Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address: USEPA REGION I, ATTN: CAROL TUCKER (USC), 60 WESTVIEW STR., LEXINGTON, MA. 02173
4. Generator's Phone (617) 223-7265

A. State Manifest Document No. NY B 434762 1
B. Generator's ID: JARD SITE, 126 BOWEN RD. BENNINGTON, VT.

5. Transporter 1 (Company Name): Chemical Waste Management, Inc
6. US EPA ID Number: ILD099202681
7. Transporter 2 (Company Name):
8. US EPA ID Number:

C. State Transporter's ID: 14647V NY
D. Transporter's Phone (716) 879-0600
E. State Transporter's ID
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address: CWM CHEMICAL SERVICES, INC. 1550 BALMER RD. MODEL CITY, NEW YORK 14107
10. US EPA ID Number: NYD049836679

G. State Facility's ID
H. Facility's Phone (716) -754-8231

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ HAZARDOUS SUBSTANCE SOLID, N.O.S. ORM-E NA9188 (POLYCHLORINATED BIPHENYLS, ZINC)	001	DT	13000 ~~12282~~	K	EPA * STATE B007
b.					EPA STATE
c.					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a RQ = 1LB. PCBS, ZINC
b
c
d

K. Handling Codes for Wastes Listed Above
a L
b
c
d

15. Special Handling Instructions and Additional Information
ERG NO. 31
* NO NUMBER ASSIGNED BY RCRA
11a.) CWM PROFILE NO. BD1927-MDC
ACCUMULATION START DATE 10/15/92
WORK ORDER NO. 207899
VERMONT WASTE NO. VT-01
CERTIFICATE OF DISPOSAL REQUIRED
EMERGENCY CONTACT NO. (617)-223-7265 USEPA REGION I

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: CAROL TUCKER for US EPA — Signature: Carol Tucker for US EPA — Mo. Day Year: 10 21 92

TRANSPORTER

17. Transporter 1 (Acknowledgement of Receipt of Materials)
Printed/Typed Name: MARVIN DYE — Signature: Marvin Dye — Mo. Day Year: 10 21 92

18. Transporter 2 (Acknowledgement or Receipt of Materials)
Printed/Typed Name — Signature — Mo. Day Year

FACILITY

19. Discrepancy Indication Space
Actual Recd 13000 K

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Roth Villeneuve — Signature: Joseph Villeneuve — Mo. Day Year: 10 22 92

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

NY B 434762 1

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 5—Generator-mailed by TSD facility

CWM Chemical Services, Inc.

Model City Facility
P.O. Box 200
1550 Balmer Road
Model City, New York 14107
716/754-8231

FEDERAL EPA ID: NYD049836679

USEPA REGION I
ATTN: MANIFEST SECTION
VTD048141741
60 WESTVIEW STREET
LEXINGTON MA 02173

CERTIFICATE OF DISPOSAL

Chemical Waste Management, Inc., has received waste material from USEPA REGIO I on 10/22/92 as described on [State Manifest or Uniform] Hazardous Waste Manifest number NYB4347621. Chemical Waste Management, Inc., hereby certifies that the above described material was landfilled on 10/22/92 in accordance wi the 40 CFR part 761 as it pertains to the land disposal of Poly-Chlorinated Biphenyl contaminated materials.

CWM Work Order Number: 20789900
CWM Profile Number: BD1927MDC

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibilitiy for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

KATHLEEN J. ARIGONI
RECORDS SUPERVISOR
Certificate # 2451
10/23/92

TEXAS WATER COMMISSION
P.O. Box 13087, Capitol Station
Austin, Texas 78711-3087

1419140

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved. OMB No. 2050-0039, expires 09-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VTD048141741 | Manifest Document No. 64653

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
ATTN: CAROL TUCKER (OSC)
USEPA REGION I
60 WESTVIEW STR.
LEXINGTON, MA. 02173

4. Generator's Phone (617) - 223-7265

A. State Manifest Document Number: 00064653

B. State Generator's ID: 99950

5. Transporter 1 Company Name: CUSTOM ENVIRONMENTAL TRANSPORT

6. US EPA ID Number: TED980918858

C. State Transporter's ID: 40756

D. Transporter's Phone: (713) - 930 - 4500

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
ROLLINS ENVIRONMENTAL SERVICES, ~~(TX)~~ INC.
2027 BATTLEGROUND RD.
DEER PARK, TEXAS 77536

10. US EPA ID Number: TXD055141378

G. State Facility's ID: 50089

H. Facility's Phone: (713) - 930 - 2300

11A. HM	11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
X	a. WASTE FLAMMABLE LIQUID, N.O.S. (XYLENE, TOLUENE) FLAMMABLE LIQUID UN1993	026	DM	03323	K	916600
	b.					
	c.					
	d.					

J. Additional Descriptions for Materials Listed Above
WASTE APPROVAL NO. HO 61167-48

K. Handling Codes for Wastes Listed Above
T-07

15. Special Handling Instructions and Additional Information
SEE "PCB CONTINUATION SHEET"
ERG NO. 27
11a.) VERMONT WASTE NO. VT-01
SITE OF GENERATION: JARD CO., INC. SUPERFUND SITE
126 BOWEN RD., BENNINGTON, VERMONT
CERTIFICATE OF DISPOSAL REQUIRED
EMERGENCY CONTACT NO. (617) - 223-7265 USEPA REGION I

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Year
CAROL TUCKER for USEPA	Carol Tucker for USEPA	10	26	92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
John A. Valler	John A. Valler	10	26	92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
RESTX INC TONY BROWN	Tony Brown	10	26	92

ROLLINS
ENVIRONMENTAL SERVICES

PCB CONTINUATION SHEET

STATE MANIFEST DOCUMENT NO: 00064653 PAGE 1 OF 2

GENERAL INFORMATION

This format has been prepared and offered ONLY as a convenience for our customer. However, the information required is mandatory to be in compliance with EPA Regulations and RES (TX) Inc. policy. (Regulatory Reference: 40 CFR-Part 761)

The PCB Continuation Sheet, if necessary, must accompany the Manifest. (Note: The required information should be indicated in Section 15 of the Manifest, if space permits).

State Manifest Document Number is indicated on the Manifest in Item 4 (8 digits). Please reference this number at the top of each continuation sheet.

COLUMN 1: Indicate RES (TX) Inc. Lab Reference Number (HO-XXXXX-XX) as indicated in Manifest Section 15.

COLUMN 2: Indicate Unique Identifying No. (Maximum of 10 Alpha-Numeric digits) as assigned by generator to EACH PCB article or container and as indicated on each PCB article or container via RES provided label.

COLUMN 3: Indicate type of PCB waste, i.e., transformer, capacitor, oil, debris, etc.

COLUMN 4: Indicate the Date of Removal from service for disposal as indicated on each PCB article or container.

COLUMN 5: Indicate the weight of each PCB article or container in KILOGRAMS only.

COLUMN 6: Indicate the proper PCB Waste Code, i.e, PCB 1 defined as PCB Articles, transformers, capacitors, etc. and PCB 2 defined as PCB Containers.

(1) RES (TX) INC. HO-NUMBER	(2) GENERATOR'S "UNIQUE IDENTIFYING NO." (MAXIMUM 10-DIGITS)	(3) TYPE OF PCB WASTE	(4) DATE OF REMOVAL FROM SERVICE FOR DISPOSAL	(5) WEIGHT KILOGRAMS	(6) PCB WASTE CODE
HO-61167-48	JCI001	CONTAMINATED SOLIDS/SOILS	10/13/92	119.55	PCB1
HO-61167-48	JCI002	CONTAMINATED SOLIDS/SOILS	10/13/92	125.90	PCB1
HO-61167-48	JCI003	CONTAMINATED SOLIDS/SOILS	10/13/92	EST. 136.36	PCB1
HO-61167-48	JCI004	CONTAMINATED SOLIDS/SOILS	10/13/92	130.45	PCB1
HO-61167-48	JCI005	CONTAMINATED SOLIDS/SOILS	10/13/92	120.90	PCB1
HO-61167-48	JCI006	CONTAMINATED SOLIDS/SOILS	10/13/92	115.91	PCB1
HO-61167-48	JCI007	CONTAMINATED SOLIDS/SOILS	10/13/92	130	PCB1
HO-61167-48	JCI008	CONTAMINATED SOLIDS/SOILS	10/13/92	120.45	PCB1
HO-61167-48	JCI009	CONTAMINATED SOLIDS/SOILS	10/13/92	132.73	PCB1
HO-61167-48	JCI010	CONTAMINATED SOLIDS/SOILS	10/13/92	122.73	PCB1
HO-61167-48	JCI011	CONTAMINATED SOLIDS/SOILS	10/13/92	119.55	PCB1
HO-61167-48	JCI012	CONTAMINATED SOLIDS/SOILS	10/13/92	129.09	PCB1
HO-61167-48	JCI013	CONTAMINATED SOLIDS/SOILS	10/13/92	130	PCB1

15

RES-50-948

STATE MANIFEST DOCUMENT NO: 00064653

PAGE 2 OF 2

(1) RES (TX) INC. HO-NUMBER	(2) GENERATOR'S "UNIQUE IDENTIFYING NO." (MAXIMUM 10-DIGITS)	(3) TYPE OF PCB WASTE	(4) DATE OF REMOVAL FROM SERVICE FOR DISPOSAL	(5) WEIGHT KILOGRAMS	(6) PCB WASTE CODE
HO-61167-48	JCI014	CONTAMINATED SOLIDS/SOILS	10/13/92	129.09	PCB1
HO-61167-48	JCI015	CONTAMINATED SOLIDS/SOILS	10/13/92	135.45	PCB1
HO-61167-48	JCI016	CONTAMINATED SOLIDS/SOILS	10/13/92	132.73	PCB1
HO-61167-48	JCI017	CONTAMINATED SOLIDS/SOILS	10/13/92	130.90	PCB1
HO-61167-48	JCI018	CONTAMINATED SOLIDS/SOILS	10/13/92	119.09	PCB1
HO-61167-48	JCI019	CONTAMINATED SOLIDS/SOILS	10/13/92	131.36	PCB1
HO-61167-48	JCI020	CONTAMINATED SOLIDS/SOILS	10/13/92	120.45	PCB1
HO-61167-48	JCI021	CONTAMINATED SOLIDS/SOILS	10/13/92	121.82	PCB1
HO-61167-48	JCI022	CONTAMINATED SOLIDS/SOILS	10/13/92	135.45	PCB1
HO-61167-48	JCI023	CONTAMINATED SOLIDS/SOILS	10/13/92	132.73	PCB1
HO-61167-48	JCI024	CONTAMINATED SOLIDS/SOILS	10/13/92	EST. 136.36	PCB1
HO-61167-48	JCI025	CONTAMINATED SOLIDS/SOILS	10/13/92	EST. 136.36	PCB1
HO-61167-48	JCI026	CONTAMINATED SOLIDS/SOILS	10/13/92	127.27	PCB1

(20)

*THIS FORM MAY BE REPRODUCED.

This completes the Certificates of Destruction per Manifest Number TX00064653.

Disposal Methods :		
	'I' - Waste that was incinerated.	
	'L' - Waste that was landfilled.	
Disposal Facility :	ROLLINS ENVIRONMENTAL SERVICES (TX) INC	
(Incinerated Waste)	PO BOX 609	
	DEER PARK	TX 77536
EPA ID:	TXD055141378	
Shipping Codes :		
(Landfill) UE -	U.S. ECOLOGY	
	P.O. BOX 576	
	BEATTY	NV 89003
EPA ID:	NVT330010000	

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Please call (713) 930-2317 if there are any questions concerning the information on this Certificate of Disposal.

Authorized Agent
ROLLINS ENVIRONMENTAL SERVICES (TX) INC

PROGRAM-ID: PTR1722C ROLLINS ENVIRONMENTAL SERVICES (TX) INC
RUN DATE : 1/07/93 CERTIFICATE OF DISPOSAL
RUN TIME : 4:38 PM PAGE: 1

Certificate of Disposal Name and Address	Stream Number	Order Number	Manifest Number	Received Date	Final Disposal
	061167	147940	TX00064653	10/28/92	12/17/92

USEPA REGION I
60 WESTVIEW STREET
LEXINGTON MA 02173
Attn: CAROL TUCKER

Inventory Cntrl Nbr	Customer's Unique Serial Number	CONTAINER Type	CONTAINER Contents	Prod Code	SHP TO	Disposal Mthd	Disposal Date
002541300	JCI008	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541301	JCI011	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541302	JCI005	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541303	JCI010	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541304	JCI022	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541305	JCI009	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541306	JCI026	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541307	JCI012	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541308	JCI002	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/12/92
002541309	JCI001	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/12/92
002541310	JCI004	55SD	DEBRIS	48	UE	L	12/17/92
	Contents Only			48		I	11/12/92
002541311	JCI007	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/12/92
002541312	JCI015	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541313	JCI023	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/12/92
002541314	JCI025	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541315	JCI024	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/18/92
002541316	JCI003	55SD	DEBRIS	48	UE	L	11/30/92
	Contents Only			48		I	11/18/92
002541317	JCI017	55SD	DEBRIS	48	UE	L	11/30/92

Certificate of Disposal Name and Address	Stream Number	Order Number	Manifest Number	Received Date	Final Disposal
	061167	147940	TX00064653	10/28/92	12/17/92

USEPA REGION I
60 WESTVIEW STREET
LEXINGTON MA 02173
Attn: CAROL TUCKER

Inventory Cntrl Nbr	Customer's Unique Serial Number	CONTAINER Type	CONTAINER Contents	Prod Code	SHP TO	Disposal Mthd	Disposal Date
	Contents Only			48		I	11/18/92
002541318	JCI020	55SD	DEBRIS	48	UE	L	12/17/92
	Contents Only			48		I	12/02/92
002541319	JCI019	55SD	DEBRIS	48	UE	L	11/30/92
	Contents Only			48		I	11/18/92
002541320	JCI021	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541321	JCI006	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541322	JCI018	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541323	JCI016	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/14/92
002541324	JCI013	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/12/92
002541325	JCI014	55SD	DEBRIS	48	UE	L	11/20/92
	Contents Only			48		I	11/12/92
	Total Containers :	26					

STRAIGHT BILL OF LADING

ORIGINAL—NOT NEGOTIABLE

Shipper No. C374-A05 (LOAD #2)

Carrier No. _____

Page 1 of 1

BLUE DIAMOND Co. (Name of Carrier) (SCAC)

Date 10/27/92

TO: Consignee — On Collect on Delivery shipments, the letters "COD" must appear before consignee's name & or as otherwise provided in Item 430, Sec. 1.

CARDINAL COMPLIANCE CORP.

Street P.O. BOX 3471

CAMDEN, N.J. 08101

Destination CARDINAL COMPLIANCE CORP. BALTIMORE, MD. 4201 E. FAIRMONT AVE. Zip Code 21224

FROM: Shipper ENVIRONMENTAL TECHNOLOGY OF NORTH AMERICA, INC.

Street 3705 SAUNDERS AVE. RICHMOND, VA. 23227

Origin USEPA REGION I ERCS SITE JARD Co., INC. SUPERFUND SITE 126 BOWEN RD. BENNINGTON VERMONT

Vehicle Number TRAILER NO. 35775

Route RT. 9 TO I-91 TO I-95 SOUTH TO BALTIMORE, MARYLAND.

No. of Units & Container Type	HM	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203	UNB or NAB	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
150 EMPTY CONTAINERS		EMPTY DRUMS AND CONTAINERS	N/A	4,000 LBS	Approx. 4,000 LBS.		
		NON-HAZARDOUS / RCRA NON-HAZ					
		BREAKDOWN ON CONTAINERS:					
		65 x 55 gal. size					
		37 x 5 gal. size					
		8 x 85 gal. size					
		5 x 92 gal. size					
		3 x 30 gal. size (DRUMS & TRASH CANS)					
		32 x 1 gal. or less size					
		(78 NO. OF TOTAL PIECES → REMAINING CONTAINERS ARE INSIDE OTHER CONTAINERS)					

PLACARDS TENDERED: YES ☐ NO ☒ NONE REQUIRED

REMIT C.O.D. TO: ADDRESS N/A

Note — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding N/A

$ _____ per _____.

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked and labeled, and are in all respects in proper condition for transport by ☐ Rail ☐ Highway ☐ Water (DELETE NON-APPLICABLE MODE OF TRANSPORT) according to applicable international and national governmental regulations.

_____ Signature

COD Amt: $ N/A

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

_____ (Signature of Consignor)

C.O.D. FEE: PREPAID ☐ COLLECT ☐ $ N/A

TOTAL CHARGES: $

FREIGHT CHARGES

FREIGHT PREPAID except when box at right is checked ☐ Check box if charges are to be collect

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER ENVIRONMENTAL TECHNOLOGY OF NORTH AMERICA, INC.

PER _____ RAY WILLIS

CARRIER BLUE DIAMOND Co.

PER _____

1

CARDINAL COMPLIANCE CORPORATION

CERTIFICATE OF DESTRUCTION

THIS HEREBY CERTIFIES THAT ALL MATERIAL ON OUR INVOICE NO: 021121, DATED 10/21/92 AND INVOICE NO: 021151, DATED 10/28/92

FROM: ENVIRONMENTAL TECHNOLOGY
- JARD SITE -

HAS BEEN DESTROYED BY THIS DATE: 11/5/92

EXECUTED BY:

C Kyle - /DP

CARDINAL COMPLIANCE CORPORATION

125 Strafford Avenue
Suite 200
Wayne, Pennsylvania 19087

215-688-8118
800-822-8826
Fax 215-688-9165

...IVATION
...ES REGULATION

...S WASTE MANIFEST

...O. Box 12820, Albany, New York 12212

Form Approved. OMB No. 2050-0039. Expires 9-30-91

...OUS ...IFEST

1. Generator's US EPA No. VTD048141741 — Manifest Document No. 98093

2. Page 1 of 1

Information in the shaded areas is not required by Federal Law.

A. State Manifest Document No. NY B 259809 3

...enerator's Name and Mailing Address: US EPA Region I, 60 West View Street, Lexington, MA 02173

ATTN: CAROL TUCKER (617)-223-7265

4. Generator's Phone (202) 442-4014

B. Generator's ID 126 Bowen Road, Bennington, VT 05201 (Jard Site

5. Transporter 1 (Company Name): Tri-S

6. US EPA ID Number: CTD016424210

C. State Transporter's ID 87156 CT

D. Transporter's Phone 203 875-2110

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone ( )

9. Designated Facility Name and Site Address: Northeast Environmental Services, Inc., Canal Road, Wampsville, NY 13163

10. US EPA ID Number: NYD057770109

G. State Facility's ID

H. Facility's Phone (315) 697-3979

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Liquid, N.O.S. ORM-E NA9189 (D009,D039,D040)RQ	001	TT	01875	G	EPA D009,D039, D040 / STATE
b.					EPA / STATE
c.					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above

a Dioctylphthalate, 1,1,1-Trichloroethane

b

c

d

K. Handling Codes for Wastes Listed Above

a B

b

c

d

15. Special Handling Instructions and Additional Information

Emergency Response # (800) 533-4042

a) P736-98-A001

RQ= 1 lb.

P736-1-92

ERG NO. 31 USEPA REGIONAL EMERGENCY #.S (617)-223-7265

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am a large quantity generator, I certify that I have program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small generator, I have made a good faith effort to minimize my waste and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: [illegible] | Signature: [illegible] | Mo. Day Year

17. Transporter 1 (Acknowledgement of Receipt of Materials)

Printed/Typed Name: Sherwood [illegible] | Signature: [illegible] | Mo. Day Year ... 92

18. Transporter 2 (Acknowledgement of Receipt of Materials)

Printed/Typed Name | Signature | Mo. Day Year

19. Discrepancy Indication Space: 11A Should Also Read (D009, D039, D040 F001 F002 F005)RQ

IA = 4028 F001 F002 F005 D009 D039 D040

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: David J. [illegible] | Signature: [illegible] | Mo. Day Year ... 92

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

COPY 5 – Generator – mailed by TSD facility

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the N.Y. Dept. of Environmental Conservation (518) 457-7362.

NY B 259809 3

NORTHEAST ENVIRONMENTAL SERVICES, INC.
A Subsidiary of
Environmental Services of America, Inc.

D I S P O S A L C E R T I F I C A T E

NORTHEAST ENVIRONMENTAL SERVICES, INC. Certifies that as of The 11th Day of November, 1992. It has been properly Processed the following waste:

Hazardous Waste Liquid(Dioctylphthalate, 1,1,1-Trichloroethane)

Job#P736-1-92

1875 GAL. recieved on manifest # NYB259809 3

Dated 11/ 11/ 92.

From: US EPA Region 1

60 West View St.

Lexington, MA 02173

Processing Was In Compliance With All Local, State And Federal Laws And Regulations In Effect As Of This Date.

NORTHEAST ENVIRONMENTAL SERVICES, INC.

By Robert C Miller

Robert C Miller

Title President

Date 11/23/92

NEW JERSEY DIVISION
119 Paris Street
Newark, NJ 07105-3831
Telephone (201) 589-3850
Fax (201) 817-9669

HEADQUARTERS
Marguerite Drive West
RR3, Box 8B
Canastota, NY 13032
Telephone (315) 697-3979
Fax (315) 697-3867

PENNSYLVANIA DIVISION
Building C-2
2495 Boulevard of The Generals
Norristown, PA 19403
Telephone (215) 631-5110
Fax (215) 630-9674

NES DRUM TRACKING FORM

B NUMBER: P136-1-92 GENERATOR: US EPA REGION I PAGE 1 OF 1

MANIFEST # NYB2598093 EPA ID# VTD048141741 TRANSPORTER: TRIS

TE: 11/11/92 REGION # 98 TESTED BY: DCE

HRS Reference #39

INCOMING INFORMATION							CONSOL INFO.	DISPOSAL INFORMATION			
RUM #	SIZE TYPE	WT.	DOT SHIPPING NAME	NES CODE	EPA #	MCS #	NEW DRUM #	DATE	DISP. CODE	NES JOB #	MANIFEST #
1	1895 G		HW#L 111-TCE) (Dioctylphthalate)	S	D009, 39 D010	U028, B001 F003 F005 A001		11-11-92	R.W CMT	39 441 92	021570 11001